



## **INDUSTRIAL WASTEWATER DISCHARGE PERMIT**

**PERMIT NO. MAN006**

Effective January 1, 2022 (Revised August 1, 2023)  
Expires: December 31, 2026

### **ISSUED TO:**

**Micron Technology, Inc. Virginia  
9600 Godwin Drive, Manassas, VA 20110**

### **ISSUED BY:**

**Upper Occoquan Service Authority  
14631 Compton Road, Centreville, VA 20121  
703-830-2200**

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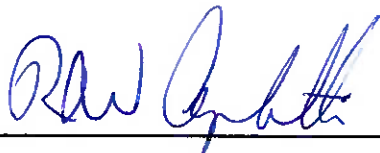
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**UPPER OCCOQUAN SERVICE AUTHORITY  
INDUSTRIAL WASTEWATER DISCHARGE PERMIT  
PERMIT NO. MAN006**

**Effective:**     January 1, 2022 (Revised August 1, 2023)

**Expires:**     December 31, 2026

1. In compliance with the provisions of the Code of the City of Manassas, Sewers and Sewage Disposal, Chapter 118, Article IV, §118-341, et seq., (Ordinance) and with any applicable provisions of Federal or State law or regulation, Micron Technology, Inc. Virginia (Permittee) is authorized to discharge industrial wastewater into the Publicly Owned Treatment Works (System or POTW), owned or operated by the City of Manassas or the Upper Occoquan Service Authority (UOSA), from a facility located at 9600 Godwin Drive, Manassas, Virginia, in accordance with the effluent limitations, monitoring requirements and other conditions set forth in Parts II and III of this Industrial Wastewater Discharge Permit (Permit).
2. Facility operations and treatment of all industrial wastewater shall conform with the plans, specifications and other supporting data previously submitted to UOSA except as modified in this Permit. The Permittee shall notify UOSA of any changes in industrial processes or wastewater discharges in accordance with the conditions set forth in Part III of this Permit.
3. The approval of plans and specifications does not relieve the Permittee of the responsibility of operating the facility in a reliable and consistent manner to meet the facility performance requirements in the Permit and the provisions of the Ordinance. If facility deficiencies, designs and/or operations are identified in the future that could affect the facility performance or reliability, it is the responsibility of the Permittee to correct such deficiencies.



Upper Occoquan Service Authority,  
Robert W. Angelotti, Executive Director



Date

## PART I

### Section A - Definitions

Any definitions not listed in this Section shall be the same as in 9 VAC 25-31-10 or in §118-342 of the Ordinance. Definitions related to sampling are located on Table 1.

1. ***Act and the Act.*** The Federal Water Pollution Control Act, also known as the Clean Water Act (CWA), as amended, 33 U.S.C. 1251, *et. seq.*
2. ***Approval Authority.*** The Director of the Department of Environmental Quality.
3. ***Authorized or Duly Authorized Representative of the Industrial User / Permittee.***
  - A. The president, secretary, treasurer, or a vice-president of the Permittee in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the Permittee.
  - B. The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investments recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge Permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with the Permittee's corporate procedures.
  - C. A duly authorized representative of the individual designated above if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company and the written authorization is submitted to UOSA. Such designation does not relieve any other person described above of being an authorized representative.
4. ***Biochemical Oxygen Demand (BOD<sub>5</sub>)***: The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure, for five days at 20 degrees Celsius, expressed in terms of weight and concentration (milligrams per liter).
5. ***Bypass.*** The intentional diversion of waste streams from any portion of a treatment facility.

6. **Categorical Pretreatment Standard or Categorical Standard.** National categorical pretreatment standard or national pretreatment standard; any regulation containing pollutant discharge limits promulgated by EPA in accordance with sections 307(b) and (c) of the Act (33 U.S.C section 1317) that apply to a specific category of users and that appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.
7. **Chemical Oxygen Demand (COD).** A measure of the oxygen required to oxidize all compounds, both organic and inorganic, in water.
8. **Control Authority.** The Superintendent as defined in this Permit. UOSA is the Control Authority for this Permit.
9. **Cooling Water.** The water discharged from any use such as air conditioning, cooling or refrigeration, or to which the only pollutant added is heat.
10. **Electronic Components Point Source Category.** The National Pretreatment Standards codified at 40 CFR Part 469 contain the Semiconductor Subcategory. The Permittee is a semiconductor manufacturer that is subject to the requirements of the Semiconductor Subcategory, as applicable.
11. **Indirect Discharge.** The discharge or the introduction of nondomestic pollutants from any source regulated under section 307(b) or (c) of the Act, (33 U.S.C. 1317), into the POTW, including holding tank waste discharged into the system.
12. **Industrial User (IU).** A source of indirect discharge; any nondomestic source discharging pollutants into the System or POTW.
13. **Instantaneous Limit.** For a non-flow permit parameter, the maximum concentration or loading of a pollutant allowed in any single sample. For flow, the maximum discrete flow rate measured at any time.
14. **Interference.** The inhibition or disruption of the POTW treatment processes or operations, which contributes to a violation of any requirement of the POTW's VPDES Permit. The term includes prevention of sewage sludge use or disposal by the POTW in accordance with section 405 of the Act, (33 U.S.C. 1345) or any criteria, guidelines, or regulations developed pursuant to the Solid Waste Disposal Act (SWDA), the Clean Air Act (CAA), the Toxic Substances Control Act (TSCA), or more stringent state criteria (including those contained in any state sludge management plan prepared pursuant to Title IV of SWDA) applicable to the method of disposal or use employed by the POTW.
15. **National Categorical Pretreatment Standard.** Any regulation containing pollutant discharge limits promulgated by the EPA in accordance with section 307 (b) and (c) of the Act, which applies to a specific category of Industrial Users.

16. **National Pretreatment Standard.** Any regulation containing pollutant discharge limits promulgated by the EPA in accordance with section 307(b) and (c) of the Act (33 U.S.C. 1317) which applies to Industrial Users. This term includes prohibitive discharge limits and local limits established pursuant to 40 CFR 403.5.
17. **Pass-Through.** A discharge which exits the treatment plant effluent into waters of the U.S. in quantities or concentrations which alone or in conjunction with indirect discharges from other sources, is a cause of a violation of any requirements of UOSA's VPDES Permit, including an increase in the magnitude or duration of a violation.
18. **Pretreatment or Treatment.** The reduction of the amount of pollutants, the elimination of pollutants, the alteration of the nature of pollutants, or the alteration of the nature of pollutant properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into the POTW. The reduction or alteration can be obtained by physical, chemical or biological processes, process changes, or other means, except as prohibited by 40 CFR section 403.6(d).
19. **Pretreatment Requirements.** Any substantive or procedural requirement related to pretreatment, other than a national pretreatment standard imposed on an industrial user.
20. **Publicly Owned Treatment Works (POTW).** A treatment works as defined by section 212 of the Act, (33 U.S.C. 1292) whether owned by the City of Manassas, or UOSA, of which the City of Manassas is a member. This definition includes any sewers that convey wastewater to the POTW treatment plant, but does not include pipes, sewers or other conveyances not connected to a facility providing treatment. For the purposes of this article, POTW shall also include any sewers that convey wastewaters to the POTW from persons outside the City of Manassas who are, by contract or agreement with the City of Manassas, users of the POTW. POTW shall also refer to the governing body of the POTW, and the authorized agents, officers, and representatives thereof.
21. **POTW Treatment Plant.** That portion of the POTW designed to provide treatment to wastewater.
22. **Sample Locations.** The two sample locations for this Permit are described in Appendix B.
23. **Shall or Must.** Shall or must are mandatory; *May* is permissive.
24. **Significant Industrial User (SIU).**
  - A. Industrial users subject to categorical pretreatment standards; and,
  - B. Any other industrial user that:
    1. Discharges an average of 25,000 gallons per day or more of process wastewater, or

2. Contributes a process waste stream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the treatment plant, or
  3. Is designated as significant by the Control Authority on the basis that the industrial user has reasonable potential for causing pass through or interference or has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement.
25. **Significant Noncompliance.** A violation of one or more of the specific criteria listed in 40 CFR 403.8(f) (2) (vii) – (viii). If the Permittee is determined to be in significant noncompliance it will be included in the annually published list of users in significant noncompliance.
26. **Solvent / Toxic Organics Management Plan (STOMP).** A plan required by 40 CFR 403 designed to manage toxic organic compounds at an industrial facility. A STOMP must be submitted to the Superintendent / Control Authority for approval if the Permittee does not want to sample annually for Total Toxic Organic (TTO) compounds.
27. **Superintendent.** The person or entity designated to supervise the operation of the POTW treatment plant which provides wastewater treatment service to the Permittee, and who is charged with certain duties and responsibilities by the Ordinance, or the Superintendent's duly authorized representative. A person or entity who is charged with the operation or upkeep of sewers that convey wastewater to the POTW treatment plant but who does not supervise the operation of the POTW treatment plant itself is not a Superintendent. For this Permit, UOSA is the Superintendent. The City of Manassas is a member jurisdiction of UOSA.
28. **System.** The POTW, as defined in this Permit.
29. **Total Dissolved Solids (TDS).** The total dissolved (filterable) solids as determined by use of the method specified in 40 CFR Part 136.
30. **Total Toxic Organics (TTO).** Any pollutant or combination of pollutants listed as toxic in regulations promulgated by the Administrator of the Environmental Protection Agency under the provision of CWA 307(a)(1) or other Acts.
31. **Toxic Pollutant.** Any pollutant or combination of pollutants listed as toxic in regulations promulgated by the Administrator of the EPA under the provision of CWA 307(a)(1) or other Acts.
32. **Upset.** An exceptional incident in which there is unintentional and temporary non-compliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the Permittee, excluding such factors as operational error, improperly designed or inadequate treatment facilities, or lack of preventative maintenance, or careless or improper operation.

33. ***User.*** Any person who contributes, causes, or permits the contribution of wastewater into a POTW. Micron, the Permittee, is the User for this Permit.

## PART II

### Section A - Volume of Discharge

1. Due to the capacity limitations of the City of Manassas, any discharge by the Permittee is contingent on the ability to use a 100 million-gallon holding pond. This holding pond, the Clean Water Manassas Holding Pond, must meet all requirements of the City of Manassas, be under the control of the City of Manassas and be operated by the City of Manassas.
2. The monthly average wastewater discharge volume shall not exceed 3.8 million gallons per day (mgd).
3. The maximum daily discharge shall not exceed 5.3 million gallons.
4. The maximum instantaneous flow shall not exceed 6.0 mgd.

### Section B - Prohibitions and Limitations

1. General discharge prohibitions.

The Permittee shall not discharge any pollutant or constituent prohibited under Section 118-361 of the Ordinance. Nor shall the Permittee contribute or cause to be contributed, directly or indirectly, any pollutant or wastewater which cause pass through; interference for the POTW; or prevents the POTW from generating products for beneficial reuse. Pollutants, substances, or wastewater prohibited by this section shall not be processed or stored in such a manner that they could be discharged to the POTW. This includes, but is not limited to:

- A. Any liquids, solids, or gases which by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances to cause fire or explosion or be injurious in any other way to the POTW or to the operation of the POTW. At no time shall two successive readings on an explosion hazard meter, at the point of discharge into the system (or at any point in the system) be more than five percent, or any single reading over ten percent, of the lower explosive limit of the meter, nor shall the closed cup flashpoint be less than 140 degrees Fahrenheit or 60 degrees Celsius using the test methods specified in 40 CFR 261.21. Prohibited materials include, but are not limited to, gasoline, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides and sulfides and any other substances which the POTW, the Commonwealth or the EPA has notified the Permittee is a fire hazard or a hazard to the system.

- B. Solid or viscous substances which may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities, such as, but not limited to, sludge screenings, or other residues from the pretreatment of industrial wastes, grease, garbage with particles greater than one-half inch in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshings, entrails, whole blood, feathers, ashes, cinders, sand, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, spent grains, spent hops, waste paper, wood, plastics, gas, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud, or glass grinding or polishing wastes.
- C. Any wastewater having a pH less than 5.0 or greater than 10.0, or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW.
- D. Any wastewater containing toxic pollutants in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test, or exceed the limitation set forth in a categorical pretreatment standard. A toxic pollutant shall include but not be limited to any pollutant identified pursuant to section 307(a)(1) of the Act.
- E. Any noxious or malodorous liquids, gases or solids which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair.
- F. Any substance which may cause the POTW's effluent or any other product of the POTW such as residues, sludges, or scums to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations developed under section 405 of the Act, any criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or Commonwealth criteria applicable to the sludge management method being used.
- G. Any substance which will cause the POTW to violate its VPDES and/or Commonwealth disposal system permit or the receiving water quality standards.

- H. Any wastewater with objectionable color not removed in the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions.
- I. Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at the introduction into the POTW which exceeds 40 degrees Celsius (104 degrees Fahrenheit).
- J. Any pollutants, including oxygen-demanding pollutants (BOD, etc.), released at a flow rate and/or pollutant concentration which will cause interference to the POTW. In no case shall a slug load have a flow rate or contain concentrations or qualities of pollutants that exceed for any period longer than 15 minutes more than five times the average 24-hour concentration, quantities or flow during normal operation.
- K. Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the superintendent in compliance with applicable Commonwealth or federal regulations.
- L. Any wastewater which causes a hazard to human life or creates a public nuisance.
- M. Any fats or grease, including but not limited to petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass-through.
- N. Any trucked or hauled pollutants, except at discharge points designated by UOSA.
- O. Any wastewater containing pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW (or at any point in the system) in a quantity that may cause worker health and safety problems.
- P. Any material identified as hazardous waste according to 40 CFR Part 261 except as may be specifically authorized by UOSA.
- Q. Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, cooling water, and unpolluted wastewater, unless specifically authorized by the superintendent.
- R. Medical wastes, except as specifically authorized by UOSA in an individual wastewater discharge Permit.
- S. Detergents, surface-active agents, or other substances that might cause excessive foaming in the POTW.

2. National Pretreatment Standards.

Upon promulgation of the National Pretreatment Standards, the National Standard, if more stringent than limitations imposed under this Permit, shall immediately supersede the limitations imposed under this Permit.

The Permittee is subject to the Semiconductor Subcategory of the National Pretreatment Standard codified at 40 CFR Part 469, Subpart A, as applicable.

3. Establishing More Stringent Limitations.

UOSA or the City of Manassas reserve the right to establish more stringent limitations or requirements on discharges to the System or POTW if deemed necessary.

4. Dilution.

The Permittee shall never increase the use of process water or, in any way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this Permit. For example, performing any unit operations that generate increased volumes of wastewater more frequently than is required, or to align the timing of these unit operations to coincide with sampling events to lower discharge concentrations, would be considered a violation of this Permit.

5. Required Sampling and Analysis.

The Permittee shall monitor and comply with the sampling and analyses schedule specified in Table 1 of this Permit.

6. Toxic Organic Compounds.

Table 2 contains a list of toxic organic compounds. The Permittee shall perform an analysis of each of the compounds listed in Table 2, and the sum of the concentrations for each compound (found in the discharge at a concentration greater than 0.01 mg/L) shall be defined as the Total Toxic Organics (TTO).

40 CFR Part 469.13 allows industrial users in the semiconductor subcategory to submit a Solvent/Toxic Organic Management Plan (STOMP) in lieu of monitoring for TTO and to certify that no toxic organics are discharged to the sewer. The Permittee opted to submit a STOMP, which was approved by UOSA. Failure to implement the elements of the STOMP and/or certify as specified in 40CFR Part 469.13 will trigger TTO monitoring to assess compliance with the TTO Federal Categorical

Standard of 1.37 mg/L. After the STOMP is approved and implemented, the TTO standard still applies to the industrial discharge and only the monitoring element of the categorical standard is waived.

If TTO monitoring is triggered, the Permittee shall report the results of the TTO analysis by reporting both the concentration of each individual compound and the result of the TTO sum as defined above. The Permittee shall submit the results of the EPA method 624 and EPA method 625 analyses to UOSA.

7. pH Discharge Requirements.

All wastewater discharged shall not have a pH less than 6.0 or greater than 9.0 and the pH shall be continuously monitored. A violation shall be defined as any period in which the pH falls below 6.0 or rises above 9.0 for more than 30 minutes in a 24-hour period. In no case shall the pH fall below 5.0 or rise above 10.0. The Permittee shall report instantaneous high and low pH readings each month. Only in cases where an effluent diversion valve in Micron's pretreatment system is activated due to an impending pH excursion, the pH may be reported as an average from the point that the divert valve is fully closed to one minute prior. The diversion valve shall take approximately one minute to fully close.

## **Section C – Additional Requirements**

1. Ammonia Agreement.

On January 1, 2019, the City of Manassas and UOSA entered into an agreement regarding the discharge and treatment of ammonia from the Permittee's industrial discharge (Ammonia Cost Agreement). The Ammonia Cost Agreement is incorporated by reference into this Permit. A copy of the Ammonia Cost Agreement is provided in Appendix D. This Ammonia Cost Agreement shall be monitored as part of this Permit.

2. Copper Agreement.

On August 1, 2019, the City of Manassas, UOSA, and Micron entered into an agreement regarding the Permittee's discharge and treatment of copper from the Permittee's industrial discharge (Copper Allocation Agreement). As required by the Copper Allocation Agreement, the Copper Allocation Agreement is incorporated by reference into this Permit. A copy of the Copper Allocation Agreement is provided in Appendix E. This Copper Allocation Agreement shall be enforced as part of this Permit.

3. Per- and Polyfluoro Alkyl Substance (PFAS) Monitoring and Reporting.

The 31 PFAS substances listed in Table 3 shall be monitored beginning with the **second quarter of 2022**. US EPA Method 1633 (Draft Method is acceptable until the Method is finalized by the US EPA) or an equivalent method(s) approved by UOSA, will be used for analysis of these compounds. The ***Per- and Polyfluoroalkyl Substances (PFAS) Sampling Guidelines for Non-Drinking Water*** from the California State Water Quality Control Board, Division of Water Quality (published by California Water Boards, September 2020), or sampling vendor equivalent, shall be followed until an equivalent document is published by the US EPA or the State of Virginia. The PFAS data reports shall indicate the sampling and analytical methods used.

4. SARA Toxic Release Inventory Report.

The Permittee shall provide UOSA with a copy of its SARA Toxic Release Inventory report by August 1 of each calendar year.

**Table 1: Discharge Limitations and Monitoring Frequencies**

| Parameter                 | Monthly Average Concentration (mg/L) or Loading (lb/day)<br>(See Note 1) | Daily Maximum Concentration (mg/L) or Loading (lb/day)<br>(See Note 1) | Minimum Monitoring Frequency<br>(See Notes 2, 3 & 6) | Sample Type<br>(See Note 4) |
|---------------------------|--------------------------------------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------|-----------------------------|
| Arsenic, Total            | M                                                                        | M                                                                      | Monthly                                              | 24HC                        |
| Cadmium, Total            | M                                                                        | M                                                                      | Quarterly                                            | 24HC                        |
| Chromium, Total           | M                                                                        | M                                                                      | Quarterly                                            | 24HC                        |
| Copper, Total             | M                                                                        | 12 lb/day                                                              | Quarterly                                            | 24HC                        |
| Lead, Total               | M                                                                        | M                                                                      | Quarterly                                            | 24HC                        |
| Mercury, Total            | M                                                                        | M                                                                      | Quarterly                                            | 24HC                        |
| Nickel, Total             | M                                                                        | M                                                                      | Quarterly                                            | 24HC                        |
| Potassium                 | M                                                                        | M                                                                      | Monthly                                              | 24HC                        |
| Silver, Total             | M                                                                        | M                                                                      | Quarterly                                            | 24HC                        |
| Sodium                    | 100 mg/L                                                                 | M                                                                      | Daily                                                | 24HC                        |
| Zinc, Total               | M                                                                        | M                                                                      | Quarterly                                            | 24HC                        |
| Ammonia (as N)            | M                                                                        | 2,044 lb/day                                                           | Weekly                                               | 24HC                        |
| Chemical Oxygen Demand    | 8,314 lb/day                                                             | 420 mg/L                                                               | Weekly                                               | 24HC                        |
| Biochemical Oxygen Demand | M                                                                        | M                                                                      | Bi-Weekly                                            | 24 HC or Grab               |
| Bromide (See Note 5)      | 0.1 mg/l                                                                 | M                                                                      | Daily                                                | 24HC                        |
| Chloride                  | 350 mg/L                                                                 | 650 mg/L                                                               | Weekly                                               | 24HC                        |
| Conductivity (µmhos/cm)   | M                                                                        | M                                                                      | Continuous                                           | On-Line                     |
| Cyanide, Total            | M                                                                        | M                                                                      | Monthly                                              | Grab                        |
| Fluoride (See Note 9)     | 508 lb/day & 17.4 mg/L                                                   | 32.0 mg/L                                                              | Weekly                                               | 24HC                        |
| Nitrate (as N)            | M                                                                        | 450 lb/day                                                             | Bi-Weekly                                            | 24HC                        |
| Phosphorus (as P)         | 9.0 mg/l                                                                 | M                                                                      | Bi-Weekly                                            | 24HC                        |
| Sulfate                   | 1,000 mg/L                                                               | M                                                                      | Weekly                                               | 24HC                        |
| Total Dissolved Solids    | 2,200 mg/L                                                               | NA                                                                     | Bi-weekly                                            | 24HC                        |
| Total Toxic Organics      | M                                                                        | 1.37 mg/L                                                              | STOMP Approved                                       | Grab                        |
| Total Kjeldahl Nitrogen   | 78 mg/L                                                                  | M                                                                      | Bi-Weekly                                            | 24HC                        |
| Total Suspended Solids    | 175 mg/L                                                                 | M                                                                      | Bi-Weekly                                            | 24HC                        |
| pH (See Note 8)           | NA                                                                       | 6-9 SU                                                                 | Continuous                                           | On-Line                     |
| PFAS                      | M                                                                        | M                                                                      | Quarterly                                            | Grab                        |

**Table 1 Acronyms:**

24HC = 24 Hour Composite Sample  
 M = Monitor Only and Report, No Limit  
 N = Nitrogen  
 NA = Not Applicable  
 PFAS = Per and Polyfluoroalkyl Substances  
 STOMP = Solvent/Toxic Organics Management Plan  
 TTO = Total Toxic Organics

**Table 1 Notes:**

1. Maximum allowable combined discharge concentration of Stream A and Stream B.
2. UOSA may adjust the monitoring frequency based on reported data or changed conditions.
3. **Monitoring Frequencies:** Daily = one sample per day. Weekly = one sample every week. Bi-weekly = one sample every two weeks. Monthly = one sample per month. Quarterly = one sample every three months. Continuous = ongoing or without interruption.
4. **Sample Types:** 24HC = 24 Hour Composite sample, Grab = Instantaneous grab sample, On-Line = Continuously monitored sample.
5. Bromide compliance is measured as a maximum 30-day rolling average of the daily sample results.
6. For parameters sampled daily, weekly, or bi-weekly, compliance is measured as a monthly average of the daily, weekly, or bi-weekly sample results, unless otherwise noted.
7. STOMP and TTO requirements are provided in Part II.B.6 of this Permit.
8. pH shall be between 6 and 9 standard units (SU). pH may fall below 6.0 or rise above 9.0 for no longer than 30 minutes per 24-hour period. In no case shall pH fall below 5.0 or rise above 10.0. See Part II, Section B.7 for additional information.
9. For Fluoride Monthly Average compliance, both the loading (508 lb/d) and the concentration (17.4 mg/L) limits must be met.

**Table 1 Definitions:**

**Daily Maximum Discharge.** The maximum allowable discharge of a monitoring parameter during a calendar day or other agreed upon 24-hour period (e.g., 7 am Day 1 to 6:59 am Day 2). Where daily maximum limitations are issued in units of mass or flow, the daily maximum discharge is the total mass or flow discharged over the course of the day. Where daily maximum limitations are issued in terms of a concentration, the daily maximum is the arithmetic average of all effluent samples for a pollutant collected during a calendar day or other agreed upon 24-hour period.

**Monthly Average.** The arithmetic mean of all the values for effluent samples collected during a calendar month or specified 30-day period.

**Thirty (30) Day Rolling Average.** The arithmetic mean of the values of effluent samples collected during any consecutive 30-day period consisting of the current date and the previous consecutive 29 dates.

**Maximum Instantaneous Flow:** The highest measured flow rate, in million gallons per day, during a calendar month or specified 30-day period.

**Composite Sample:** A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a time composite sample: composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or as a flow proportional composite sample: collected either as a constant sample volume at time intervals proportional to stream flow or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquots.

**Grab Sample:** A sample taken from a waste stream, on a one-time basis, with no regard to the flow in the waste stream and without consideration of time. Grab samples must be collected over a period of time not to exceed 15 minutes.

**Table 2: Toxic Organic Compounds**

1,2,4 -Trichlorobenzene  
Chloroform  
1,2 - Dichlorobenzene  
1,3 - Dichlorobenzene  
1,4 - Dichlorobenzene  
Ethyl benzene  
1,1,1 - Trichloroethane  
Methylene Chloride  
Naphthalene  
2-Nitrophenol  
Phenol  
bis (2-Ethylhexyl) Phthalate  
Tetrachloroethylene  
Toluene  
Trichloroethylene  
2-Chlorophenol  
2,4-Dichlorophenol  
4-Nitrophenol  
Pentachlorophenol  
di-n-Butyl Phthalate  
Anthracene  
1,2 - Diphenylhydrazine  
Isophorone  
Butyl Benzyl Phthalate  
1,1 - Dichloroethylene  
2,4,6 - Trichlorophenol  
Carbon Tetrachloride  
1,2, - Dichloroethane  
1,1,2 - Trichloroethane  
Dichlorobromomethane

**Table 3. PFAS Names, Abbreviations, and CAS Registry Numbers**

**Standards and Non-extracted Internal Standards<sup>1</sup>**

| Target Analyte Name                              | Abbreviation | CAS Number  |
|--------------------------------------------------|--------------|-------------|
| <b>Perfluoroalkyl carboxylic acids</b>           |              |             |
| Perfluorobutanoic acid                           | PFBA         | 375-22-4    |
| Perfluoropentanoic acid                          | PFPeA        | 2706-90-3   |
| Perfluorohexanoic acid                           | PFHxA        | 307-24-4    |
| Perfluoroheptanoic acid                          | PFHpA        | 375-85-9    |
| Perfluorooctanoic acid                           | PFOA         | 335-67-1    |
| Perfluorononanoic acid                           | PFNA         | 375-95-1    |
| Perfluorodecanoic acid                           | PFDA         | 335-76-2    |
| Perfluoroundecanoic acid                         | PFUnA        | 2058-94-8   |
| Perfluorododecanoic acid                         | PFDoA        | 307-55-1    |
| Perfluorotridecanoic acid                        | PFTTrDA      | 72629-94-8  |
| Perfluorotetradecanoic acid                      | PFTeDA       | 376-06-7    |
| <b>Perfluoroalkyl sulfonic acids</b>             |              |             |
| <b>Acid Form</b>                                 |              |             |
| Perfluorobutanesulfonic acid                     | PFBS         | 375-73-5    |
| Perfluoropentanesulfonic acid                    | PFPeS        | 2706-91-4   |
| Perfluorohexanesulfonic acid                     | PFHxS        | 355-46-4    |
| Perfluoroheptanesulfonic acid                    | PFHpS        | 375-92-8    |
| Perfluorooctanesulfonic acid                     | PFOS         | 1763-23-1   |
| Perfluorononanesulfonic acid                     | PFNS         | 68259-12-1  |
| Perfluorodecanesulfonic acid                     | PFDS         | 335-77-3    |
| Perfluorododecanesulfonic acid                   | PFDoS        | 79780-39-5  |
| <b>Fluorotelomer sulfonic acids</b>              |              |             |
| 1H,1H, 2H, 2H-Perfluorohexane sulfonic acid      | 4:2FTS       | 757124-72-4 |
| 1H,1H, 2H, 2H-Perfluorooctane sulfonic acid      | 6:2FTS       | 27619-97-2  |
| 1H,1H, 2H, 2H-Perfluorodecane sulfonic acid      | 8:2FTS       | 39108-34-4  |
| <b>Perfluorooctane sulfonamides *</b>            |              |             |
| Perfluorooctanesulfonamide                       | PFOSA        | 754-91-6    |
| N-methyl perfluorooctanesulfonamide              | NMeFOSA      | 31506-32-8  |
| N-ethyl perfluorooctanesulfonamide               | NEtFOSA      | 4151-50-2   |
| <b>Perfluorooctane sulfonamidoacetic acids *</b> |              |             |
| N-methyl perfluorooctanesulfonamidoacetic acid   | NMeFOSAA     | 2355-31-9   |
| N-ethyl perfluorooctanesulfonamidoacetic acid    | NEtFOSAA     | 2991-50-6   |
| <b>Perfluorooctane sulfonamide ethanols *</b>    |              |             |
| N-methyl perfluorooctanesulfonamidoethanol       | NMeFOSE      | 24448-09-7  |
| N-ethyl perfluorooctanesulfonamidoethanol        | NEtFOSE      | 1691-99-2   |
| <b>Per- and Polyfluoroether carboxylic acids</b> |              |             |
| Hexafluoropropylene oxide dimer acid             | HFPO-DA      | 13252-13-6  |
| 4,8-Dioxa-3H-perfluorononanoic acid              | ADONA        | 919005-14-4 |
| Perfluoro-3-methoxypropanoic acid                | PFMPA        | 377-73-1    |
| Perfluoro-4-methoxybutanoic acid                 | PFMBA        | 863090-89-5 |
| Nonafluoro-3,6-dioxaheptanoic acid               | NFDHA        | 151772-58-6 |

| Target Analyte Name                                                                                                  | Abbreviation                          | CAS Number  |
|----------------------------------------------------------------------------------------------------------------------|---------------------------------------|-------------|
| Ether sulfonic acids                                                                                                 |                                       |             |
| 9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid                                                                   | 9Cl-PF3ONS                            | 756426-58-1 |
| 11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid                                                                  | 11Cl-PF3OUdS                          | 763051-92-9 |
| Perfluoro(2-ethoxyethane)sulfonic acid                                                                               | PFEESA                                | 113507-82-7 |
| Fluorotelomer carboxylic acids                                                                                       |                                       |             |
| 3-Perfluoropropyl propanoic acid                                                                                     | 3:3FTCA                               | 356-02-5    |
| 2 <i>H</i> ,2 <i>H</i> ,3 <i>H</i> ,3 <i>H</i> -Perfluorooctanoic acid                                               | 5:3FTCA                               | 914637-49-3 |
| 3-Perfluoroheptyl propanoic acid                                                                                     | 7:3FTCA                               | 812-70-4    |
| EIS Compounds                                                                                                        |                                       |             |
| Perfluoro- <i>n</i> -[ <sup>13</sup> C <sub>4</sub> ]butanoic acid                                                   | <sup>13</sup> C <sub>4</sub> -PFBA    | NA          |
| Perfluoro- <i>n</i> -[ <sup>13</sup> C <sub>5</sub> ]pentanoic acid                                                  | <sup>13</sup> C <sub>5</sub> -PFPeA   |             |
| Perfluoro- <i>n</i> -[1,2,3,4,6- <sup>13</sup> C <sub>5</sub> ]hexanoic acid                                         | <sup>13</sup> C <sub>5</sub> -PFHxA   |             |
| Perfluoro- <i>n</i> -[1,2,3,4- <sup>13</sup> C <sub>4</sub> ]heptanoic acid                                          | <sup>13</sup> C <sub>4</sub> -PFHpA   |             |
| Perfluoro- <i>n</i> -[ <sup>13</sup> C <sub>8</sub> ]octanoic acid                                                   | <sup>13</sup> C <sub>8</sub> -PFOA    |             |
| Perfluoro- <i>n</i> -[ <sup>13</sup> C <sub>9</sub> ]nonanoic acid                                                   | <sup>13</sup> C <sub>9</sub> -PFNA    |             |
| Perfluoro- <i>n</i> -[1,2,3,4,5,6- <sup>13</sup> C <sub>6</sub> ]decanoic acid                                       | <sup>13</sup> C <sub>6</sub> -PFDA    |             |
| Perfluoro- <i>n</i> -[1,2,3,4,5,6,7- <sup>13</sup> C <sub>7</sub> ]undecanoic acid                                   | <sup>13</sup> C <sub>7</sub> -PFUnA   |             |
| Perfluoro- <i>n</i> -[1,2- <sup>13</sup> C <sub>2</sub> ]dodecanoic acid                                             | <sup>13</sup> C <sub>2</sub> -PFDaA   |             |
| Perfluoro- <i>n</i> -[1,2- <sup>13</sup> C <sub>2</sub> ]tetradecanoic acid                                          | <sup>13</sup> C <sub>2</sub> -PFTeDA  |             |
| Perfluoro-1-[2,3,4- <sup>13</sup> C <sub>3</sub> ]butanesulfonic acid                                                | <sup>13</sup> C <sub>3</sub> -PFBS    |             |
| Perfluoro-1-[1,2,3- <sup>13</sup> C <sub>3</sub> ]hexanesulfonic acid                                                | <sup>13</sup> C <sub>3</sub> -PFHxS   |             |
| Perfluoro-1-[ <sup>13</sup> C <sub>8</sub> ]octanesulfonic acid                                                      | <sup>13</sup> C <sub>8</sub> -PFOS    |             |
| Perfluoro-1-[ <sup>13</sup> C <sub>8</sub> ]octanesulfonamide                                                        | <sup>13</sup> C <sub>8</sub> -PFOSA   |             |
| N-methyl- <i>d</i> <sub>3</sub> -perfluoro-1-octanesulfonamidoacetic acid                                            | D <sub>3</sub> -NMeFOSAA              |             |
| N-ethyl- <i>d</i> <sub>5</sub> -perfluoro-1-octanesulfonamidoacetic acid                                             | D <sub>5</sub> -NEtFOSAA              |             |
| 1 <i>H</i> ,1 <i>H</i> ,2 <i>H</i> ,2 <i>H</i> -Perfluoro-1-[1,2- <sup>13</sup> C <sub>2</sub> ]hexane sulfonic acid | <sup>13</sup> C <sub>2</sub> -4:2FTS  |             |
| 1 <i>H</i> ,1 <i>H</i> ,2 <i>H</i> ,2 <i>H</i> -Perfluoro-1-[1,2- <sup>13</sup> C <sub>2</sub> ]octane sulfonic acid | <sup>13</sup> C <sub>2</sub> -6:2FTS  |             |
| 1 <i>H</i> ,1 <i>H</i> ,2 <i>H</i> ,2 <i>H</i> -Perfluoro-1-[1,2- <sup>13</sup> C <sub>2</sub> ]decane sulfonic acid | <sup>13</sup> C <sub>2</sub> -8:2FTS  |             |
| Tetrafluoro-2-heptafluoropropoxy- <sup>13</sup> C <sub>3</sub> -propanoic acid                                       | <sup>13</sup> C <sub>3</sub> -HFPO-DA |             |
| N-methyl- <i>d</i> <sub>7</sub> -perfluorooctanesulfonamidoethanol                                                   | D <sub>7</sub> -NMeFOSE               |             |
| N-ethyl- <i>d</i> <sub>9</sub> -perfluorooctanesulfonamidoethanol                                                    | D <sub>9</sub> -NEtFOSE               |             |
| N-ethyl- <i>d</i> <sub>5</sub> -perfluoro-1-octanesulfonamide                                                        | D <sub>5</sub> -NEtFOSA               |             |
| N-methyl- <i>d</i> <sub>3</sub> -perfluoro-1-octanesulfonamide                                                       | D <sub>3</sub> -NMeFOSA               |             |
| NIS Compounds                                                                                                        |                                       |             |
| Perfluoro- <i>n</i> -[2,3,4- <sup>13</sup> C <sub>3</sub> ]butanoic acid                                             | <sup>13</sup> C <sub>3</sub> -PFBA    | NA          |
| Perfluoro- <i>n</i> -[1,2,3,4- <sup>13</sup> C <sub>4</sub> ]octanoic acid                                           | <sup>13</sup> C <sub>4</sub> -PFOA    |             |
| Perfluoro- <i>n</i> -[1,2- <sup>13</sup> C <sub>2</sub> ]decanoic acid                                               | <sup>13</sup> C <sub>2</sub> -PFDA    |             |
| Perfluoro- <i>n</i> -[1,2,3,4- <sup>13</sup> C <sub>4</sub> ]octanesulfonic acid                                     | <sup>13</sup> C <sub>4</sub> -PFOS    |             |
| Perfluoro- <i>n</i> -[1,2,3,4,5- <sup>13</sup> C <sub>5</sub> ] nonanoic acid                                        | <sup>13</sup> C <sub>5</sub> -PFNA    |             |
| Perfluoro- <i>n</i> -[1,2- <sup>13</sup> C <sub>2</sub> ]hexanoic acid                                               | <sup>13</sup> C <sub>2</sub> -PFHxA   |             |
| Perfluoro-1-hexane[ <sup>18</sup> O <sub>2</sub> ]sulfonic acid                                                      | <sup>18</sup> O <sub>2</sub> -PFHxS   |             |

<sup>1</sup> The target analyte names are for the acid and neutral forms of the analytes. See Table 2 for the names and CASRN of the corresponding anion forms, where applicable.

NA Not assigned a CASRN

\* Analytes in this class may not perform as well as others

## PART III

### Section A - General Conditions

1. Severability

The provisions of this Permit are severable. If any provision of this Permit, or the application of any provision of this Permit to any circumstance, is invalidated by any court of competent jurisdiction, the remaining provisions shall not be affected and shall continue in full force and effect.

2. Duty to Comply

The Permittee must comply with all conditions of this Permit and the Ordinance. Any Permit noncompliance constitutes a violation of the Ordinance and the Clean Water Act, except the noncompliance with certain provisions of this Permit may constitute a violation of the Ordinance but not the Clean Water Act. Permit noncompliance is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or denial of a Permit renewal application.

3. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this Permit does not relieve the Permittee from its obligations regarding compliance with any and all applicable local, state and federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this Permit.

4. Duty to Mitigate

The Permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this Permit which has a reasonable likelihood of adversely affecting the City of Manassas' sewer collection system, UOSA, human health or the environment.

5. Permit Modification

This Permit may be modified at any time for good cause including, but not limited to, any of the following reasons:

- A. To incorporate any new or revised federal, state, or local pretreatment standards or requirements;
- B. To address material or substantial alterations or additions to the Permittee's operations, processes, wastewater constituents or characteristics, or discharge volume, which were not considered in drafting the effective Permit;
- C. A change in any condition in either the Permittee or the UOSA that requires either a temporary or permanent reduction or elimination of the previously authorized discharge;
- D. Information indicating that the Permitted discharge poses a threat to the POTW, POTW personnel, or the POTW's receiving waters;

- E. A violation of any terms or conditions of this Permit;
- F. A misrepresentation or failure to fully disclose all relevant facts in the Permit application or in any required reporting;
- G. A revision of, or a grant of variance from, such National Categorical Pretreatment Standards pursuant to 9VAC 25-31-850 or 40 CFR Part 403.13;
- H. To correct typographical or other errors in the Permit;
- I. To reflect transfer of the facility ownership and/or operation to a new owner/operator; and,
- J. Upon request of the Permittee, provided such request does not create a violation of any applicable requirements, standards, laws or rules and regulations.

The filing of a request by the Permittee for a Permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any Permit condition.

## 6. Permit Termination

This Permit may be voidable for non-use, cessation of operations or the transfer of business ownership. An existing Permit becomes void upon the issuance of a replacement Permit. This Permit may be terminated for any of the following reasons:

- A. Violation of any Permit conditions;
- B. Failure to report significant changes in operations or wastewater constituents or characteristics prior to the change;
- C. Failure to accurately report wastewater constituents or characteristics;
- D. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge Permit application;
- E. Failure to provide advance notice of the transfer of ownership of the facility or business conducted within the facility;
- F. Failure to provide notice of material modifications to the facility;
- G. Falsifying self-monitoring reports;
- H. Tampering with compliance monitoring equipment;
- I. Refusing to allow timely access to the facility premises and records;
- J. Failure to meet effluent limitations;
- K. Failure to pay fines;
- L. Failure to pay sewer charges;
- M. Failure to meet compliance schedules;
- N. Failure to submit timely reports; and

O. Inability to use the holding pond set forth in Part II, Section A.

## 7. Transfer of Permits

This Permit may be transferred using one of the following methods:

- A. This Permit may be transferred by the Permittee to a new owner or operator if the Permit has been modified or revoked and reissued. This includes a minor modification made to identify the new Permittee and incorporate such other requirements as may be necessary under the Ordinance and the Clean Water Act.
- B. This Permit may be automatically transferred to a new Permittee if;
  - 1. The current Permittee provides a written notice to UOSA at least 30 days in advance of the proposed transfer of the title to the facility or property; and
    - a. The notice includes a written certification by the new owner which states that the new owner has no immediate intent to change the facility's operations and processes; and
    - b. The notice includes a written agreement between the existing and new Permittees containing a specific date for transfer of Permit responsibility, coverage, and liability between them, and the assumption of responsibility for complying with the existing Permit;
  - 2. UOSA does not notify the existing Permittee and the proposed new Permittee of UOSA's intent to modify or revoke and reissue the Permit. If this notice from UOSA is not received, the transfer is effective on the date specified in the agreement mentioned in Part III, Section A(7)(B1.b.).

## 8. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittee must apply for and obtain a new Permit. All Permittees with a currently effective Permit shall submit a new application at least 180 days before the expiration date of the existing Permit unless permission for a later date has been granted by UOSA. UOSA shall not grant permission for applications to be submitted later than the expiration date of the existing Permit. The existing permit shall remain in full force until a new permit is issued, even if the permit term has expired.

## 9. Permit Appeals

The Permittee may petition to appeal the terms of this Permit within ten (10) days of receipt of the Permit. This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of this right to appeal. In its petition the Permittee must indicate the Permit provisions to which the Permittee objects, the reasons for this objection and an alternate condition, if any, that the Permittee seeks to be included in the Permit.

The effectiveness of this Permit shall not be stayed pending reconsideration by UOSA. If, after considering the petition and any arguments put forth by the Permittee, UOSA determines that reconsideration is warranted, the Permit shall be remanded back to the Permittee for reissuance. Those Permit provisions being reconsidered by UOSA shall be stayed pending reissuance. If UOSA fails to act on the appeal within 30 days, the petition to reconsider shall be deemed to be denied.

UOSA's decision not to reconsider a Permit provision shall be considered final and an administrative action for purposes of judicial review. The Permittee seeking judicial review of UOSA's final action must do so by filing a complaint with the Circuit Court for Prince William County within 60 days of UOSA's denial.

**10. Effect of a Permit**

This Permit does not convey any property rights in either real or personal property or any exclusive privileges, nor does it authorize any injury to private property or invasion of personal rights, or any infringement of Federal, State or local laws or regulations.

**11. State Law**

Nothing in this Permit shall be construed to preclude the institution of any legal action under, or relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any other State law or regulation or under authority preserved by Section 510 of the Clean Water Act. Except as provided in Permit conditions on "bypass" and "upset", nothing in this Permit shall be construed to relieve the Permittee from civil and criminal penalties for noncompliance.

**Section B - Operation and Maintenance of Pollution Controls**

**1. Proper Operation and Maintenance**

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance also includes effective plant performance, adequate funding, adequate staffing, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems, which are installed by the Permittee when the operation is necessary to achieve compliance with the conditions of this Permit.

**2. Duty to Halt or Reduce Activity**

Upon reduction of efficiency of operation, or loss or failure of all or part of the pretreatment facility, the Permittee shall, to the extent necessary to maintain compliance with this Permit, control its production or discharges (or both) until operation of the pretreatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a

defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the Permit.

### 3. Bypass of Treatment Facilities

- A. The Permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it is also essential for maintenance to assure efficient operation. These bypasses are not subject to the provisions of Part III, Section B(3)(B) and (C).
- B. Notice.
  - 1. Anticipated bypass. If the Permittee knows in advance of the need for a bypass, prior notice shall be submitted, if possible at least 10 days before the date of the bypass.
  - 2. Unanticipated bypass. The Permittee shall submit notice of an unanticipated bypass as required in Part III, Section D(10).
- C. Prohibition of bypass.
  - 1. Bypass is prohibited, and UOSA may take enforcement action against the Permittee for bypass, unless:
    - a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
    - b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, detention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
    - c. The Permittee submitted notices as required under Part III, Section B(3)(B).
  - 2. UOSA may approve an anticipated bypass if, after considering it, UOSA determines that it will meet the three conditions listed above in Part III, Section B(3)(C).

### 4. Removed Substances and Dilution

Solids and sludges, or other pollutants removed during treatment or control of wastewaters shall be disposed of in accordance with Section 405 of the CWA and Subtitles C and D of the Resource Conservation and Recovery Act (RCRA).

The Permittee shall not increase the use of process water to dilute the discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the Federal Categorical Pretreatment Standards,

the Ordinance, this Permit or any other requirement established by the City of Manassas, UOSA, or the State.

## **Section C - Monitoring and Records**

### **1. Representative Sampling**

Samples and measurements taken as required by this Permit shall be representative of the monitored activity. All samples shall be collected at one of the monitoring points identified in Appendix B. The Permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals that will insure accuracy of measurements. Monitoring points shall not be changed without notification to and the approval of UOSA.

### **2. Flow Measurements**

Flow measurement is required by this Permit and the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to ensure the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volume.

### **3. Analytical Methods to Demonstrate Continued Compliance**

All sampling and analysis required by this Permit shall be conducted according to procedures approved under Title 40 Code of Federal Regulations Part 136 or alternative methods approved by EPA. The parameters listed in Appendix A shall be analyzed using the EPA methods and corresponding quantification limits listed for each parameter.

- A. All analysis shall be performed on 24-hour flow weighted composite samples except as noted otherwise on Table 1.
- B. Cyanide analysis shall be performed on four grab type samples of the same volume. One sample shall be collected every six hours during the twenty-four-hour monitoring period. These four samples shall be combined together to make one sample for the 24-hour monitoring period.
- C. All analyses required under this Permit shall be conducted in a lab certified or accredited by the Virginia Division of Consolidated Laboratory Services (DCLS). Copies of the appropriate DCLS certification shall be maintained at the site.

### **4. Sampling Points**

Samples collected as required herein shall be collected at the sampling points identified in Appendix B.

## 5. Additional Monitoring by the Permittee

If the Permittee monitors any pollutants specifically addressed by this Permit more frequently than required by this Permit using test procedures identified in Part III, Section C(3), the results of this monitoring shall be included in the calculation and reporting of the data submitted in the Permittee's self-monitoring reports.

## 6. Inspection and Entry

The Permittee, in accordance with Section 118-395 of the Ordinance, shall allow UOSA, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- A. Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under conditions of this Permit;
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- C. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this Permit;
- D. Sample or monitor wastewater effluent at designated sampling locations at any reasonable time; and,
- E. Inspect, at reasonable times, any production, manufacturing, fabricating or chemical storage area where pollutants could originate, be stored, or be discharged to the sewer system.

## 7. Retention of Records

- A. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Permit, and records of all data used to complete the application for this Permit, for a period of at least three years from the date of the sample, measurement, report or application.

This period may be extended by request of UOSA at any time.

- B. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by UOSA shall be retained and preserved by the Permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

## 8. Record Contents

Records of sampling and analysis shall include:

- A. The date, exact place, and time of sampling measurements;

- B. The individual(s) who performed the sampling or measurements;
  - C. The date(s) and time(s) analyses were performed;
  - D. The individual(s) who performed the analyses;
  - E. The analytical techniques or method used; and
  - F. The results of such analyses.
9. **Falsifying Information**
- Knowingly making any false statement on any report or other document required by this Permit or knowingly rendering any monitoring device or method inaccurate is a crime and may result in the imposition of criminal sanctions and/or civil penalties.
10. **Duty to Provide Information**
- The Permittee shall furnish to UOSA, within ten (10) business days or such additional time as UOSA may allow, any information which UOSA may request to determine whether cause exists for modifying, revoking, and reissuing, or terminating this Permit, or to determine compliance with this Permit. UOSA may require the Permittee to furnish, upon request, such plans, specifications, and other pertinent information as may be necessary to determine the effect of the wastes from the discharge on UOSA and the quality of State waters, or such other information as may be necessary to accomplish the purposes of the Ordinance and State Water Control Law. The Permittee shall also upon request furnish to UOSA, within ten (10) business days or such additional time as UOSA may allow, copies of records required to be kept by this Permit.

## **Section D - Reporting Requirements**

1. **Self-Monitoring Reports**
- The Permittee shall submit to UOSA monthly a Self-Monitoring Report (SMR; also called a Discharge Monitoring Report or DMR) on the volume and characteristics of the wastewater discharged to the System. The Permittee shall submit the monthly SMR within twenty (20) days of the end of the monthly monitoring period. The sampling, testing, and reporting requirements can be modified by mutual agreement in writing between the Permittee and UOSA. The Permittee shall complete the Self-Monitoring Report Form contained in Appendix C and submit the form with all SMRs. Data supporting the SMRs must also be submitted electronically to UOSA within twenty (20) days of the end of the monthly monitoring period in spreadsheet format specified by UOSA. All contracted and quality checked laboratory data reports must be included with the SMRs.
2. **Reports Submission Address**
- All reports required by this Permit shall be submitted to UOSA electronically via email to [RegulatoryAffairs@uosa.org](mailto:RegulatoryAffairs@uosa.org). Failure to submit reports to this email address, or other submission method authorized by UOSA, constitutes a Permit

violation. If hardcopies of information are submitted to UOSA, the address below must be used:

Upper Occoquan Service Authority  
14631 Compton Road  
Centreville, VA 20121-2506  
Attn: Regulatory Affairs Coordinator

In addition, copies of all reports required by this Permit shall be submitted to the Virginia Department of Environmental Quality, Northern Regional Office, Regional Pretreatment Coordinator, electronically via email. A valid email address will be provided in writing by UOSA.

3. Notification of Discharge Violations: Availability Requirements

To inform the Permittee's employees of the requirements of this Permit, the Permittee shall make available to its affected employee's copies of this Permit. A notice shall be permanently posted at appropriate locations advising the affected employees to call UOSA in case of a discharge violation of this Permit or the Ordinance. The UOSA telephone number is (703) 830-2200. UOSA has personnel on duty at all times and the notification including such details as are available shall be given to the UOSA employee answering the telephone.

4. Notification of Hazardous Waste Discharge

The Permittee must submit a one-time notification to UOSA, EPA, and the Virginia Department of Waste Management, of each hazardous waste discharged to the treatment works. UOSA must be notified of any subsequent changes to the hazardous waste discharge. Refer to 40 CFR Part 403.12 (p) for a complete description of the Permittee's responsibility regarding the above notification requirements.

5. Confidentiality

UOSA is a public body subject to open record requirements. Any proprietary information contained in reports will be deemed confidential only upon written request from the Permittee, specifying the nature of the confidential information. In accordance with 40 CFR 403.14, and the Virginia Freedom of Information Act, § 2.2-3700 *et. seq.*, the Permittee must designate confidential information at the time of submission by indicating in bold letters at the top of each sheet containing such information **"CONFIDENTIAL BUSINESS INFORMATION NOT SUBJECT TO FOIA."** Effluent data is public record and shall not be withheld.

6. Notice of Planned Changes

- A. The Permittee shall give notice to UOSA as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required only when:

1. The Permittee plans alteration or addition to any building, structure, facility, or installation from which there is or may be a discharge of pollutants, the construction of which commenced:
  - a. After promulgation of standards of performance under Section 306 of the Clean Water Act which are applicable to such source; or
  - b. After proposal of standards of performance in accordance with Section 306 of the Clean Water Act which are applicable to such source, but only if the standards are promulgated in accordance with Section 306 within 120 days of their proposal.
2. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants that are subject neither to effluent limitations nor notification requirements specified elsewhere in this Permit.

7. Notice of Permit Violation and Automatic Resampling

If the results of the Permittee's wastewater analysis indicates a violation has occurred, the Permittee must notify UOSA by telephone within 24 hours of becoming aware of the violation and submit to UOSA within 5 business days a detailed written statement describing the causes of the noncomplying discharge; the measures being taken to prevent future occurrences; and the period of the discharge, including exact dates and times and/or the anticipated time when the discharge will return to compliance. Telephone notification shall be made to the UOSA Regulatory Affairs Coordinator at (703) 830-2200. Mail or email notification shall be made using the Permit Part III.D.2 contact information.

Once a violation has been discovered the Permittee is required to repeat the sampling and analysis and resubmit analysis results to UOSA within 30 days of receipt of the original sampling results. Any additional sampling and analysis results obtained by the Permittee shall be included in the Permittee's SMR.

8. Compliance Schedule Reports

Reports of compliance or noncompliance with, or any progress report on, interim and final requirements contained in any compliance schedule of this Permit shall be submitted no later than 14 days following each schedule date. Compliance schedule reporting is separate from the monthly SMRs.

9. Signatory Requirements

All applications, reports, or information submitted to UOSA must contain the following certification statement and be signed by an authorized representative as defined in Part I, Section A(3) herein and 40 CFR Part 403.12(l). *"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those*

*persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

If the Permittee has submitted a STOMP in lieu of TTO monitoring, all applications, reports, or information submitted to UOSA must contain the following certification statement and be signed by an authorized representative as defined in Part I, Section A (3) herein and 40 CFR Part 403.12 (l).

*"Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standard for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge report. I further certify that this facility is implementing the Solvent/Toxic Organics Management Plan submitted to UOSA."*

#### 10. Reports of Noncompliance

The Permittee shall report any noncompliance which may adversely affect UOSA or State waters or that may endanger public health.

- A. An oral report shall be provided within 24 hours from the time the Permittee becomes aware of the circumstances. The following shall be included as information which shall be reported within 24 hours under this paragraph:
  - 1. Any unanticipated bypass;
  - 2. Any upset which causes a noncomplying discharge to the system;
- B. A written report shall be submitted within 5 business days and shall contain:
  - 1. A description of the noncompliance and its cause;
  - 2. The period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
  - 3. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

UOSA may waive the written report on a case-by-case basis for reports of noncompliance under Part III, Section D(10) if the oral report has been received within 24 hours and no adverse impact on State waters or the System has been reported.

- C. The Permittee shall report all instances of noncompliance not reported under Part III, Section D(10)(A) or (B), in writing, at the time the next SMR is submitted. The reports shall contain the information listed in Part III, Section D(10)(B).

## 11. Operating Upsets

- A. An upset constitutes an affirmative defense to an action brought for noncompliance with technology based effluent limitations if the requirements of Part III, Section D(11)(B) are met. A determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is not a final administrative action subject to judicial review.
- B. A Permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - 1. An upset occurred and that the Permittee can identify the cause(s) of the upset;
  - 2. The permitted facility was at the time being properly operated;
  - 3. The Permittee submitted notice of the upset as required by Part III, Section D(10), and
  - 4. The Permittee complied with any remedial measures required under Part III, Section A(4).
- C. In any enforcement proceeding the Permittee seeking to establish the occurrence of an upset has the burden of proof.

## 12. Slug/Spill Prevention Plan

The Permittee shall have in place a UOSA approved Slug/Spill Prevention Plan prior to Permit issuance or renewal. The plan shall include at a minimum:

- A. A description of discharge practices, including non-routine batch discharges;
- B. A description of stored chemicals;
- C. Procedures for immediately notifying UOSA of accidental spills or any discharge that would violate a prohibition under Part II, Section B, with procedures for follow-up written notification; and
- D. If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

There shall be no changes to the Slug/Spill Prevention Plan or practices without prior approval of UOSA.

## **Section E - Penalties**

### **1. Annual Publication**

A list of all industrial users which were in significant noncompliance, as defined in 40 CFR Part 403.8(f)(2)(viii), during the previous 12 months shall be annually published by UOSA in the largest daily newspaper within its service area. Accordingly, the Permittee is appraised that noncompliance with this Permit may lead to enforcement action and may result in publication of its name in an appropriate newspaper in accordance with this section.

### **2. Civil and Criminal Liability**

Nothing in this Permit shall be construed to relieve the Permittee from civil and/or criminal penalties for noncompliance under local, state, and federal laws or regulations.

### **3. Penalties for Violations of Permit Conditions**

Violations of any Permit condition subjects the Permittee to a civil penalty not to exceed \$32,500 dollars per day. Such fines shall be assessed on a per-violation, per-day basis. In the case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation. In addition to fines, the Permittee shall be responsible for monetary assessments for actual damages to sewers, treatment works and appurtenances, and for costs, attorney fees and other expenses resulting from the violation. The Permittee may also be subject to additional sanctions (civil or criminal) under state and/or federal law.

### **4. Recovery of Costs Incurred**

In addition to civil and criminal liability, the Permittee violating any provisions of this Permit or the Ordinance or causing damage to or otherwise inhibiting the POTW or UOSA's wastewater treatment system shall be liable to UOSA for any expense, loss, or damage, caused by such violation or discharge. UOSA shall bill the Permittee for any cleaning, repair, or replacement, work, and related services caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation of the Permit and Ordinance.

## APPENDIX A: Methods and Quantification Limits

### Analyses Methods and Quantification Limits for Selected Permit Parameters

| Parameter                    | Level of Quantification (mg/L) (Note 1) | EPA Method Reference (Note 2) |
|------------------------------|-----------------------------------------|-------------------------------|
| Arsenic                      | 0.01                                    | 200.7                         |
| Cadmium                      | 0.001                                   | 200.8                         |
| Chromium                     | 0.01                                    | 200.7                         |
| Copper                       | 0.01                                    | 200.7                         |
| Lead                         | 0.01                                    | 200.7                         |
| Mercury                      | 0.0002                                  | 245.1                         |
| Nickel                       | 0.01                                    | 200.7                         |
| Silver                       | 0.0005                                  | 200.8                         |
| Zinc                         | 0.01                                    | 200.7                         |
| Fluoride                     | 0.01                                    | SM20 ED 4500-FC               |
| Cyanide                      | 0.01                                    | SM22 4500 CNE-20              |
| COD                          | 50                                      | SM22 522OD                    |
| 1,2,4-Trichlorobenzene       | 0.01                                    | 625                           |
| Chloroform                   | 0.01                                    | 624                           |
| 1,2-Dichlorobenzene          | 0.01                                    | 625                           |
| 1,3-Dichlorobenzene          | 0.01                                    | 625                           |
| 1,4-Dichlorobenzene          | 0.01                                    | 625                           |
| Ethyl Benzene                | 0.01                                    | 624                           |
| 1,1,1-Trichloroethane        | 0.01                                    | 624                           |
| Methylene Chloride           | 0.01                                    | 624                           |
| Naphthalene                  | 0.01                                    | 625                           |
| 2-Nitrophenol                | 0.01                                    | 625                           |
| Phenol                       | 0.01                                    | 625                           |
| bis (2-Ethylhexyl) Phthalate | 0.01                                    | 625                           |
| Tetrachloroethylene          | 0.01                                    | 624                           |
| Toluene                      | 0.01                                    | 624                           |
| Trichloroethylene            | 0.01                                    | 624                           |
| 2-Chlorophenol               | 0.01                                    | 625                           |
| 2,4-Dichlorophenol           | 0.01                                    | 625                           |
| 4-Nitrophenol                | 0.01                                    | 625                           |
| Pentachlorophenol            | 0.01                                    | 625                           |
| di-n-Butyl Phthalate         | 0.01                                    | 625                           |
| Anthracene                   | 0.01                                    | 625                           |
| 1,2-Diphenylhydrazine        | 0.01                                    | 625                           |
| Isophorone                   | 0.01                                    | 625                           |
| Butyl Benzyl Phthalate       | 0.01                                    | 625                           |
| 1,1-Dichloroethylene         | 0.01                                    | 624                           |
| 2,4,6-Trichlorophenol        | 0.01                                    | 625                           |
| Carbon Tetrachloride         | 0.01                                    | 624                           |
| 1,2-Dichloroethane           | 0.01                                    | 624                           |
| 1,1,2-Trichloroethane        | 0.01                                    | 624                           |
| Dichlorobromomethane         | 0.01                                    | 624                           |
| PFAS                         | Varies                                  | DRAFT or FINAL 1633           |

## Notes:

1. The lowest concentration used to calibrate a measurement system in accordance with the procedure published for the method.
2. Alternate analysis methods may be used with prior notification and approval from UOSA. Alternate methods must meet the stated Level of Quantification.

## **APPENDIX B: Sampling Points**

### **SAMPLING POINT 1**

Sampling Point 1 includes two locations within the Micron Technology Industrial Wastewater Treatment Plant. One sample, Stream DAW1, is collected as a 24-hour composite of treated wastewater from System 1. The other location, Stream DAW2, is a 24-hour composite sample discharge of treated wastewater from System 2. Either system is configured to receive flow from any wastewater drain system (CAW, BWW, DAW, etc.). Sampling Point 1 is the flow-weighted composite of the two streams, Stream DAW1 and DAW2 and are representative of Micron Technology's industrial discharge.

### **SAMPLING POINT 2**

Sampling Point 2 is located at the Clean Water Manassas Holding Pond manhole upstream of the Clean Water Manassas Holding Pond. The manhole receives the effluent from Micron Technology Virginia's Industrial Wastewater Treatment Plant and is comprised solely of the combination of DAW1 and DAW2. Samples collected at this location are representative of Micron Technology's industrial discharge.

**APPENDIX C: Self-Monitoring Report Form****UPPER OCCOQUAN SERVICE AUTHORITY  
SELF-MONITORING REPORT FORM****MICRON TECHNOLOGY, INC. VIRGINIA  
SELF-MONITORING REPORT FORM****Permit Title: UOSA Industrial Wastewater Discharge Permit****Facility Name: Micron Technology, Inc. VA****Permit #: MAN006****Address: 9600 Godwin Drive****Jurisdiction: City of Manassas, Manassas, VA 22110****Micron Operator in Responsible Charge:**

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|                       |           |      |
|-----------------------|-----------|------|
| Typed or Printed Name | Signature | Date |
|-----------------------|-----------|------|

**Micron Principal Executive or Authorized Agent:**

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|                       |           |      |
|-----------------------|-----------|------|
| Typed or Printed Name | Signature | Date |
|-----------------------|-----------|------|

**Monitoring Period: From:**  **To:**

### Continuous Flow Monitoring Summary – Streams DAW1 + DAW2

| Parameter            |              | Flow            |            |               |       | Monitoring Frequency<br>(See Notes 2,3,6) | Sample Type<br>(See Note 4) |
|----------------------|--------------|-----------------|------------|---------------|-------|-------------------------------------------|-----------------------------|
|                      |              | Monthly Average | Daily Max. | Instantaneous | Units |                                           |                             |
| Flow<br>(See Note 1) | Reported     |                 |            |               | mgd   | Continuous                                | Meter                       |
|                      | Permit Limit | 3.8             | 5.3        | 6.0           |       |                                           |                             |

### Continuous Monitoring Data Summary – Stream DAW1

| Parameter          |              | Flow |      |            | Monitoring Frequency<br>(See Notes 2,3,6) | Sample Type<br>(See Note 4) |
|--------------------|--------------|------|------|------------|-------------------------------------------|-----------------------------|
|                    |              | Min. | Max. | Units      |                                           |                             |
| pH<br>(See Note 8) | Reported     |      |      | SU         | Continuous                                | Meter                       |
|                    | Permit Limit | 6.0  | 9.0  |            |                                           |                             |
| Conductivity       | Reported     |      |      | µmhos / cm | Continuous                                | Meter                       |
|                    | Permit Limit | M    | M    |            |                                           |                             |

### Continuous Monitoring Data Summary – Stream DAW2

| Parameter          |              | Flow |      |            | Monitoring Frequency<br>(See Notes 2,3,6) | Sample Type<br>(See Note 4) |
|--------------------|--------------|------|------|------------|-------------------------------------------|-----------------------------|
|                    |              | Min. | Max. | Units      |                                           |                             |
| pH<br>(See Note 8) | Reported     |      |      | SU         | Continuous                                | Meter                       |
|                    | Permit Limit | 6.0  | 9.0  |            |                                           |                             |
| Conductivity       | Reported     |      |      | µmhos / cm | Continuous                                | Meter                       |
|                    | Permit Limit | M    | M    |            |                                           |                             |

### Daily Monitoring Data Summary

| Parameter               |              | Concentration (mg/L) |            | Loading (lb/day) |            | Monitoring Frequency<br>(See Notes 2,3,6) | Sample Type<br>(See Note 4) |
|-------------------------|--------------|----------------------|------------|------------------|------------|-------------------------------------------|-----------------------------|
|                         |              | Monthly Average      | Daily Max. | Monthly Average  | Daily Max. |                                           |                             |
| Bromide<br>(See Note 5) | Reported     |                      |            |                  | NA         | Daily                                     | 24 h composite              |
|                         | Permit Limit | 0.1                  | M          | M                | NA         |                                           |                             |
| Sodium                  | Reported     |                      |            | NA               | NA         | Daily                                     | 24 h composite or Grab      |
|                         | Permit Limit | 100                  | M          | NA               | NA         |                                           |                             |

### Weekly & Bi-Weekly Monitoring Data Summary (See Note 6)

| Parameter                |              | Concentration (mg/L) |            | Loading (lb/d)  |            | Monitoring Frequency<br>(See Notes 2,3,6) | Sample Type<br>(See Note 4) |
|--------------------------|--------------|----------------------|------------|-----------------|------------|-------------------------------------------|-----------------------------|
|                          |              | Monthly Average      | Daily Max. | Monthly Average | Daily Max. |                                           |                             |
| Ammonia, as N            | Reported     |                      |            |                 |            | Weekly                                    | 24 h composite              |
|                          | Permit Limit | M                    | M          | M               | 2,044      |                                           |                             |
| COD                      | Reported     | NA                   |            |                 | NA         | Weekly                                    | 24 h composite              |
|                          | Permit Limit | NA                   | 420        | 8,314           | NA         |                                           |                             |
| Chloride                 | Reported     |                      |            | NA              | NA         | Weekly                                    | 24 h composite              |
|                          | Permit Limit | 350                  | 650        | NA              | NA         |                                           |                             |
| Fluoride<br>(See Note 9) | Reported     |                      |            |                 |            | Weekly                                    | 24 h composite              |
|                          | Permit Limit | 17.4                 | 32.0       | 508             | M          |                                           |                             |
| Sulfate                  | Reported     |                      |            | NA              | NA         | Weekly                                    | 24 h composite              |
|                          | Permit Limit | 1,000                | M          | NA              | NA         |                                           |                             |
| BOD                      | Reported     | NA                   |            |                 | NA         | Bi-weekly                                 | 24 h composite or Grab      |
|                          | Permit Limit | NA                   | M          | M               | NA         |                                           |                             |
| Nitrate, as N            | Reported     | NA                   |            | NA              |            | Bi-weekly                                 | 24 h composite              |
|                          | Permit Limit | NA                   | M          | NA              | 450        |                                           |                             |
| Phosphorus, as P         | Reported     |                      | NA         |                 | NA         | Bi-weekly                                 | 24 h composite              |
|                          | Permit Limit | 9.0                  | NA         | M               | NA         |                                           |                             |
| Total Dissolved Solids   | Reported     |                      | NA         | NA              | NA         | Bi-weekly                                 | 24 h composite              |
|                          | Permit Limit | 2,200                | NA         | NA              | NA         |                                           |                             |
| Total Kjeldahl Nitrogen  | Reported     |                      | NA         |                 | NA         | Bi-weekly                                 | 24 h composite              |
|                          | Permit Limit | 78                   | NA         | M               | NA         |                                           |                             |
| Total Suspended Solids   | Reported     |                      | NA         |                 | NA         | Bi-weekly                                 | 24 h composite              |
|                          | Permit Limit | 175                  | NA         | M               | NA         |                                           |                             |

### Monthly Monitoring Data Summary

| Parameter                            |              | Concentration (mg/L)        | Loading (lb/day)            | Monitoring Frequency<br>(See Notes 2,3,6) | Sample Type<br>(See Note 4) |
|--------------------------------------|--------------|-----------------------------|-----------------------------|-------------------------------------------|-----------------------------|
| Arsenic, Total<br>(monitoring only)  | Reported     |                             |                             | Monthly                                   | 24 h composite              |
|                                      | Permit Limit | M                           | M                           |                                           |                             |
| Cyanide, Total<br>(monitoring only)  | Reported     |                             |                             | Monthly                                   | Grab/24 h composite         |
|                                      | Permit Limit | M                           | M                           |                                           |                             |
| Potassium<br>(monitoring only)       | Reported     |                             |                             | Monthly                                   | 24 h composite              |
|                                      | Permit Limit | M                           | M                           |                                           |                             |
| Total Toxic Organics<br>(See Note 7) | Reported     | NA                          | NA                          | Monthly                                   | Grab                        |
|                                      | Permit Limit | STOMP<br>Submitted/Approved | STOMP<br>Submitted/Approved |                                           |                             |

### Quarterly Monitoring Data Summary

| Parameter       |              | Concentration (mg/L) | Loading (lb/day) | Monitoring Frequency<br>(See Notes 2,3,6) | Sample Type<br>(See Note 4) |
|-----------------|--------------|----------------------|------------------|-------------------------------------------|-----------------------------|
| Cadmium, Total  | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | M                |                                           |                             |
| Chromium, Total | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | M                |                                           |                             |
| Copper, Total   | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | 12               |                                           |                             |
| Lead, Total     | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | M                |                                           |                             |
| Nickel, Total   | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | M                |                                           |                             |
| Mercury         | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | M                |                                           |                             |
| Silver, Total   | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | M                |                                           |                             |
| Zinc, Total     | Reported     |                      |                  | Quarterly                                 | 24 h composite              |
|                 | Permit Limit | M                    | M                |                                           |                             |

**Self-Monitoring Report Form Acronyms:**

24HC = 24 Hour Composite Sample

M = Monitor Only, Report (No Limit)

N = Nitrogen

NA = Not Applicable

PFAS = Per and Polyfluoroalkyl Substances

STOMP = Solvent/Toxic Organics Management Plan

TTO = Total Toxic Organics

**Self-Monitoring Report Form Notes:**

1. Maximum allowable combined discharge concentration of Stream A and Stream B. Instantaneous flow may not exceed 6.0 mgd at any time.
2. UOSA may adjust the monitoring frequency based on reported data or changed conditions.
3. **Monitoring Frequencies:** Daily = one sample per day. Weekly = one sample every week. Biweekly = one sample every two weeks. Monthly = one sample per month. Quarterly = one sample every three months. Continuous = ongoing or without interruption.
4. **Sample Types:** 24HC = 24 Hour Composite sample, Grab = Instantaneous grab sample, On-Line = Continuously monitored sample.
5. Bromide compliance is measured as a maximum 30-day rolling average of the daily sample results.
6. For parameters sampled daily, weekly, or bi-weekly, compliance is measured as a monthly average of the daily, weekly, or bi-weekly sample results, unless otherwise noted.
7. STOMP and TTO requirements are provided in Part II.B.6 of this Permit.
8. pH shall be between 6 and 9 standard units (SU). pH may fall below 6.0 or rise above 9.0 for no longer than 30 minutes per 24-hour period. In no case shall pH fall below 5.0 or rise above 10.0. See Part II, Section B.7 for additional information.
9. For Fluoride Daily Maximum compliance, both the loading (508 lb/d) and the concentration (32 mg/L) limits must be met.

**Table 1 Definitions:**

**Daily Maximum Discharge.** The maximum allowable discharge of a monitoring parameter during a calendar day or other agreed upon 24-hour period (e.g., 7 am Day 1 to 6:59 am Day 2). Where daily maximum limitations are issued in units of mass or flow, the daily maximum discharge is the total mass or flow discharged over the course of the calendar day or other agreed upon 24-hour period. Where daily maximum limitations are issued in terms of a concentration, the daily maximum is the arithmetic average of all effluent samples for a pollutant collected during a calendar day or other agreed upon 24-hour period.

**Monthly Average.** The arithmetic mean of all the values for effluent samples collected during a calendar month or specified 30-day period.

**Thirty (30) Day Rolling Average.** The arithmetic mean of the values of effluent samples collected during any consecutive 30-day period consisting of the current date and the previous consecutive 29 dates.

**Maximum Instantaneous Flow:** The highest measured flow rate, in million gallons per day, during a calendar month or specified 30-day period.

**Composite Sample:** A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a time composite sample: composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or as a flow proportional composite sample: collected either as a constant sample volume at time intervals proportional to stream flow or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquots.

**Grab Sample:** A sample taken from a waste stream, on a one-time basis, with no regard to the flow in the waste stream and without consideration of time. Grab samples must be collected over a period not to exceed 15 minutes.

## **APPENDIX D: Ammonia Cost Agreement**

## **Appendix D**

### **Ammonia Cost Agreement**

This Agreement is entered into this 1<sup>st</sup> day of January, 2019 between the Upper Occoquan Service Authority (“UOSA”) and the City of Manassas (“the City”).

**WHEREAS**, UOSA and the City are signatories to a 2007 Revised and Restated Service Agreement as that Agreement has been amended from time to time (“the Service Agreement”); and

**WHEREAS**, pursuant to section 6.7 of the Service Agreement UOSA has allocated to each member Political Subdivision proportionate shares of the total designed UOSA Plant loadings, including loadings for ammonia, in the same percentage as the member’s allocated percentage of total UOSA Plant design flow (MGD); and

**WHEREAS**, UOSA has allocated 1,620 pounds per day of its ammonia loading capacity to the City of Manassas based upon a maximum 30 day rolling average; and

**WHEREAS**, Micron Technologies, Inc. (“Micron”) is expanding its facility in the City of Manassas and this expansion is anticipated to significantly exceed the City’s allocation of ammonia; and

**WHEREAS**, UOSA has determined that it can develop facilities at the UOSA Plant to accommodate the increased ammonia discharged by the City and Micron; and

**WHEREAS**, the facilities to be developed include adding a carbon source infrastructure and delivering the carbon chemical to UOSA’s activated sludge process, along with delivering additional air into the system; and

**WHEREAS**, these infrastructure improvements will allow UOSA to receive and treat all the anticipated ammonia load above and beyond the City’s current ammonia allocation;

**NOW THEREFORE**, in consideration of the premises stated above and herein, the parties agree to the following:

1. The City agrees to fund all reasonable and necessary costs of the infrastructure improvements that will allow UOSA to receive and treat the increased ammonia discharged by the City and Micron (“the Ammonia Project”). The Ammonia Project is anticipated to include storage and delivery of a carbon source. This funding shall include, but not be limited to planning, preliminary design, design, construction, and commissioning and shall further include all UOSA personnel costs and UOSA legal counsel costs as needed and directly related to the design, construction and implementation of the Ammonia Project.
2. The Parties agree that the Ammonia Project is only being undertaken because of the City’s future anticipated allocation exceedance. The City and Micron shall have a right to review and provide input into the Ammonia Project. However, UOSA shall have the right to

determine (in its sole discretion) the details of the Ammonia Project based on the needs of UOSA to treat the City's exceedance of its ammonia allocation.

3. The City further agrees to pay for all operation and maintenance ("O&M") costs including UOSA labor costs (per the Service Agreement) for ammonia delivered to UOSA from the City in excess of the City's ammonia allocation. The excess ammonia treatment costs shall consist of, but not be limited to, A) the cost of the carbon chemical necessary to treat the pounds of ammonia beyond the City's allocation; and B) the cost of the energy to pump additional air into the system to treat each pound of ammonia beyond the City's allocation.

4. The O&M costs for the excess ammonia treatment shall be reconciled on an annual basis for the prior fiscal year. A hypothetical O&M cost calculation procedure is provided in Attachment A. The actual charges to the City will be based on the City's actual ammonia loadings, actual Carbon Source operations, and actual O&M costs, calculated after the end of each Fiscal Year.

5. The O&M costs for the excess ammonia treatment above the City's allocated share to be paid by the City will be credited to the non-exceeding jurisdictions on a pro rata basis in proportion to their delivered flows (i.e. the basis for O&M charges).

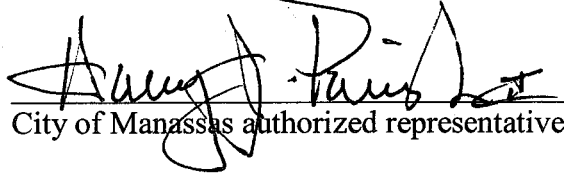
6. So long as UOSA has to rely upon the Ammonia Project to treat the City's ammonia exceedances, the City shall bear all the costs associated with the Ammonia Project, including, but not limited to costs of maintenance and repair, and upon termination of this Agreement, costs to terminate any contracts awarded by UOSA relating to the Ammonia Project and to disable and safely and appropriately secure the Ammonia Project infrastructure so that it presents no liability to UOSA and/or its employees, if any; provided, however, if the operation of the Ammonia Project effectively prevents any other member Political Subdivision from exceeding its respective ammonia allowance, UOSA shall give a credit to the City that represents the other jurisdiction's proportionate share of the O&M costs of the Ammonia Project, based on its actual ammonia loading in excess of its allowance. The Ammonia Project may also be used as an emergency back up measure by UOSA for the benefit of all Political Subdivisions, and in such situations the O&M costs associated with such use shall be allocated to each Political Subdivision based on Service Agreement allocated capacities.

7. If the City determines that its discharge does not and will not exceed its allocated ammonia loading capacity and that the Ammonia Project is therefore no longer necessary, it may give 30 days advance written notice to UOSA that the City wants to terminate this Agreement. If UOSA concurs that the Ammonia Project is no longer necessary for the City to meet its obligations under the Service Agreement, including Section 6.7, this Agreement will be terminated. UOSA agrees that its concurrence will not be unreasonably withheld or delayed.

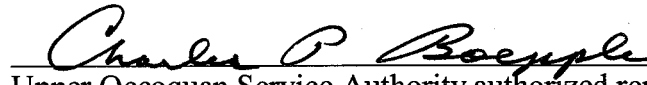
8. Based upon this Agreement, and pursuant to Section 6.7 of the Service Agreement, UOSA advises the City that (a) it may deliver its sewage to UOSA with the increased

ammonia loadings that will be treated by the Ammonia Project; and (b) that UOSA will receive and treat all of the ammonia loadings received from the City as set forth in this Agreement, up to the design limits of the Ammonia Project. Nothing in this Agreement shall modify any obligations of the Parties in the Service Agreement.

9. The effective date of this Agreement shall be January 1, 2019.

  
City of Manassas authorized representative

3 APRIL 2019  
Date

  
Upper Occoquan Service Authority authorized representative

APRIL 9, 2019  
Date

**City of Manassas Hypothetical Ammonia Load Exceedance  
Operations and Maintenance Calculations For FY-XX  
(Post Micron Expansion Scenario)**

Attachment A

**Calculation Methodology:**

1. Used FY18 actual NH<sub>4</sub> loading data to determine City of Manassas Domestic NH<sub>4</sub> Loading; added Micron's Post-Expansion NH<sub>4</sub> Load (based on estimated permit limits).
2. Subtracted City of Manassas + Micron NH<sub>4</sub> Loads from City of Manassas Allocated NH<sub>4</sub> Load to obtain total City of Manassas NH<sub>4</sub> Load Exceedance.
3. Multiplied Energy Costs, as determined by UOSA's Design Engineer (\$0.1/lb), by City's total FY NH<sub>4</sub> Loading Exceedance.
4. Carbon source costs (such as Micro C), as determined by UOSA's Design Engineer (\$2/lb), multiplied by NH<sub>4</sub> Exceedance during days when use of a Carbon Source is required each year (estimated to be February - March, or around 60 days per year).
5. Estimate of \$20,000 added for annual O&M of equipment.
6. Actual charges will be based on actual NH<sub>4</sub> loadings, actual Carbon Source operations, and actual annual O&M costs after the end of each Fiscal Year.
6. Energy costs will be reimbursed to each non-exceeding jurisdiction on a pro rata basis.

**Post Micron Expansion FY-XX Hypothetical Totals  
(per attached data tables)**

|                                                     |                  |
|-----------------------------------------------------|------------------|
| Total Fiscal Year NH <sub>4</sub> Exceedance (lbs): | (486,414)        |
| Total Energy Cost @ \$0.1/lb:                       | \$48,641         |
| Total NH <sub>4</sub> Load for Carbon Source (lbs): | (79,079)         |
| Total Cost for Carbon Source @ \$2/lb:              | \$158,157        |
| Total Estimated O&M :                               | \$20,000         |
| <b>Hypothetical Fiscal Year Total:</b>              | <b>\$226,799</b> |

**City of Manassas Hypothetical Ammonia Load Exceedance Calculations For FY-XX**  
**(Post Micron Expansion Scenario)**

Attachment A

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 7/1  | 2984                                               | 1620                                | (1364)                                      |
| 7/2  | 2986                                               | 1620                                | (1367)                                      |
| 7/3  | 2985                                               | 1620                                | (1365)                                      |
| 7/4  | 2984                                               | 1620                                | (1364)                                      |
| 7/5  | 2978                                               | 1620                                | (1359)                                      |
| 7/6  | 3009                                               | 1620                                | (1389)                                      |
| 7/7  | 3005                                               | 1620                                | (1385)                                      |
| 7/8  | 3012                                               | 1620                                | (1392)                                      |
| 7/9  | 3010                                               | 1620                                | (1391)                                      |
| 7/10 | 3012                                               | 1620                                | (1393)                                      |
| 7/11 | 2994                                               | 1620                                | (1374)                                      |
| 7/12 | 2993                                               | 1620                                | (1374)                                      |
| 7/13 | 2995                                               | 1620                                | (1375)                                      |
| 7/14 | 3001                                               | 1620                                | (1381)                                      |
| 7/15 | 2997                                               | 1620                                | (1378)                                      |
| 7/16 | 3002                                               | 1620                                | (1382)                                      |
| 7/17 | 3000                                               | 1620                                | (1380)                                      |
| 7/18 | 3001                                               | 1620                                | (1381)                                      |
| 7/19 | 2992                                               | 1620                                | (1372)                                      |
| 7/20 | 2985                                               | 1620                                | (1366)                                      |
| 7/21 | 2985                                               | 1620                                | (1365)                                      |
| 7/22 | 2983                                               | 1620                                | (1363)                                      |
| 7/23 | 2984                                               | 1620                                | (1365)                                      |
| 7/24 | 2989                                               | 1620                                | (1369)                                      |
| 7/25 | 2994                                               | 1620                                | (1374)                                      |
| 7/26 | 2996                                               | 1620                                | (1376)                                      |
| 7/27 | 2991                                               | 1620                                | (1372)                                      |
| 7/28 | 2984                                               | 1620                                | (1364)                                      |
| 7/29 | 2959                                               | 1620                                | (1340)                                      |
| 7/30 | 2939                                               | 1620                                | (1320)                                      |
| 7/31 | 2933                                               | 1620                                | (1313)                                      |

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 8/1  | 2934                                               | 1620                                | (1314)                                      |
| 8/2  | 2939                                               | 1620                                | (1319)                                      |
| 8/3  | 2942                                               | 1620                                | (1322)                                      |
| 8/4  | 2945                                               | 1620                                | (1326)                                      |
| 8/5  | 2914                                               | 1620                                | (1294)                                      |
| 8/6  | 2919                                               | 1620                                | (1300)                                      |
| 8/7  | 2925                                               | 1620                                | (1306)                                      |
| 8/8  | 2936                                               | 1620                                | (1316)                                      |
| 8/9  | 2937                                               | 1620                                | (1317)                                      |
| 8/10 | 2942                                               | 1620                                | (1322)                                      |
| 8/11 | 2956                                               | 1620                                | (1336)                                      |
| 8/12 | 2972                                               | 1620                                | (1352)                                      |
| 8/13 | 2976                                               | 1620                                | (1356)                                      |
| 8/14 | 2981                                               | 1620                                | (1362)                                      |
| 8/15 | 2979                                               | 1620                                | (1359)                                      |
| 8/16 | 2979                                               | 1620                                | (1359)                                      |
| 8/17 | 2982                                               | 1620                                | (1363)                                      |
| 8/18 | 2987                                               | 1620                                | (1367)                                      |
| 8/19 | 2984                                               | 1620                                | (1365)                                      |
| 8/20 | 2983                                               | 1620                                | (1363)                                      |
| 8/21 | 2987                                               | 1620                                | (1367)                                      |
| 8/22 | 2987                                               | 1620                                | (1367)                                      |
| 8/23 | 2985                                               | 1620                                | (1365)                                      |
| 8/24 | 2985                                               | 1620                                | (1365)                                      |
| 8/25 | 2988                                               | 1620                                | (1368)                                      |
| 8/26 | 2991                                               | 1620                                | (1371)                                      |
| 8/27 | 2999                                               | 1620                                | (1379)                                      |
| 8/28 | 3027                                               | 1620                                | (1407)                                      |
| 8/29 | 3052                                               | 1620                                | (1432)                                      |
| 8/30 | 3059                                               | 1620                                | (1440)                                      |
| 8/31 | 3059                                               | 1620                                | (1440)                                      |

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 9/1  | 3052                                               | 1620                                | (1432)                                      |
| 9/2  | 3048                                               | 1620                                | (1428)                                      |
| 9/3  | 3042                                               | 1620                                | (1422)                                      |
| 9/4  | 3042                                               | 1620                                | (1422)                                      |
| 9/5  | 3028                                               | 1620                                | (1409)                                      |
| 9/6  | 3013                                               | 1620                                | (1393)                                      |
| 9/7  | 3012                                               | 1620                                | (1392)                                      |
| 9/8  | 3008                                               | 1620                                | (1389)                                      |
| 9/9  | 3005                                               | 1620                                | (1386)                                      |
| 9/10 | 2993                                               | 1620                                | (1373)                                      |
| 9/11 | 2973                                               | 1620                                | (1354)                                      |
| 9/12 | 2958                                               | 1620                                | (1338)                                      |
| 9/13 | 2953                                               | 1620                                | (1334)                                      |
| 9/14 | 2945                                               | 1620                                | (1325)                                      |
| 9/15 | 2940                                               | 1620                                | (1321)                                      |
| 9/16 | 2930                                               | 1620                                | (1311)                                      |
| 9/17 | 2927                                               | 1620                                | (1307)                                      |
| 9/18 | 2926                                               | 1620                                | (1306)                                      |
| 9/19 | 2927                                               | 1620                                | (1308)                                      |
| 9/20 | 2919                                               | 1620                                | (1299)                                      |
| 9/21 | 2914                                               | 1620                                | (1294)                                      |
| 9/22 | 2914                                               | 1620                                | (1294)                                      |
| 9/23 | 2915                                               | 1620                                | (1296)                                      |
| 9/24 | 2914                                               | 1620                                | (1295)                                      |
| 9/25 | 2918                                               | 1620                                | (1298)                                      |
| 9/26 | 2919                                               | 1620                                | (1299)                                      |
| 9/27 | 2910                                               | 1620                                | (1290)                                      |
| 9/28 | 2909                                               | 1620                                | (1289)                                      |
| 9/29 | 2903                                               | 1620                                | (1283)                                      |
| 9/30 | 2893                                               | 1620                                | (1273)                                      |
|      |                                                    |                                     |                                             |

**City of Manassas Hypothetical Ammonia Load Exceedance Calculations For FY-XX**  
**(Post Micron Expansion Scenario)**

Attachment A

| Date  | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|-------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 10/1  | 2890                                               | 1620                                | (1271)                                      |
| 10/2  | 2896                                               | 1620                                | (1277)                                      |
| 10/3  | 2896                                               | 1620                                | (1277)                                      |
| 10/4  | 2897                                               | 1620                                | (1277)                                      |
| 10/5  | 2899                                               | 1620                                | (1280)                                      |
| 10/6  | 2904                                               | 1620                                | (1284)                                      |
| 10/7  | 2897                                               | 1620                                | (1277)                                      |
| 10/8  | 2901                                               | 1620                                | (1282)                                      |
| 10/9  | 2912                                               | 1620                                | (1292)                                      |
| 10/10 | 2912                                               | 1620                                | (1292)                                      |
| 10/11 | 2914                                               | 1620                                | (1295)                                      |
| 10/12 | 2919                                               | 1620                                | (1299)                                      |
| 10/13 | 2912                                               | 1620                                | (1292)                                      |
| 10/14 | 2918                                               | 1620                                | (1298)                                      |
| 10/15 | 2921                                               | 1620                                | (1301)                                      |
| 10/16 | 2924                                               | 1620                                | (1305)                                      |
| 10/17 | 2921                                               | 1620                                | (1301)                                      |
| 10/18 | 2926                                               | 1620                                | (1306)                                      |
| 10/19 | 2924                                               | 1620                                | (1305)                                      |
| 10/20 | 2928                                               | 1620                                | (1308)                                      |
| 10/21 | 2929                                               | 1620                                | (1309)                                      |
| 10/22 | 2929                                               | 1620                                | (1310)                                      |
| 10/23 | 2923                                               | 1620                                | (1303)                                      |
| 10/24 | 2919                                               | 1620                                | (1299)                                      |
| 10/25 | 2925                                               | 1620                                | (1305)                                      |
| 10/26 | 2923                                               | 1620                                | (1304)                                      |
| 10/27 | 2934                                               | 1620                                | (1314)                                      |
| 10/28 | 2933                                               | 1620                                | (1314)                                      |
| 10/29 | 2939                                               | 1620                                | (1319)                                      |
| 10/30 | 2949                                               | 1620                                | (1329)                                      |
| 10/31 | 2952                                               | 1620                                | (1332)                                      |

| Date  | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|-------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 11/1  | 2941                                               | 1620                                | (1322)                                      |
| 11/2  | 2937                                               | 1620                                | (1317)                                      |
| 11/3  | 2934                                               | 1620                                | (1314)                                      |
| 11/4  | 2937                                               | 1620                                | (1317)                                      |
| 11/5  | 2935                                               | 1620                                | (1315)                                      |
| 11/6  | 2938                                               | 1620                                | (1318)                                      |
| 11/7  | 2943                                               | 1620                                | (1323)                                      |
| 11/8  | 2936                                               | 1620                                | (1317)                                      |
| 11/9  | 2942                                               | 1620                                | (1322)                                      |
| 11/10 | 2942                                               | 1620                                | (1323)                                      |
| 11/11 | 2945                                               | 1620                                | (1325)                                      |
| 11/12 | 2946                                               | 1620                                | (1327)                                      |
| 11/13 | 2946                                               | 1620                                | (1326)                                      |
| 11/14 | 2945                                               | 1620                                | (1326)                                      |
| 11/15 | 2945                                               | 1620                                | (1325)                                      |
| 11/16 | 2954                                               | 1620                                | (1334)                                      |
| 11/17 | 2955                                               | 1620                                | (1336)                                      |
| 11/18 | 2959                                               | 1620                                | (1339)                                      |
| 11/19 | 2961                                               | 1620                                | (1341)                                      |
| 11/20 | 2961                                               | 1620                                | (1341)                                      |
| 11/21 | 2963                                               | 1620                                | (1343)                                      |
| 11/22 | 2967                                               | 1620                                | (1347)                                      |
| 11/23 | 2966                                               | 1620                                | (1346)                                      |
| 11/24 | 2962                                               | 1620                                | (1343)                                      |
| 11/25 | 2964                                               | 1620                                | (1344)                                      |
| 11/26 | 2960                                               | 1620                                | (1340)                                      |
| 11/27 | 2962                                               | 1620                                | (1342)                                      |
| 11/28 | 2957                                               | 1620                                | (1337)                                      |
| 11/29 | 2951                                               | 1620                                | (1331)                                      |
| 11/30 | 2953                                               | 1620                                | (1334)                                      |
|       |                                                    |                                     |                                             |

| Date  | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|-------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 12/1  | 2957                                               | 1620                                | (1338)                                      |
| 12/2  | 2959                                               | 1620                                | (1339)                                      |
| 12/3  | 2959                                               | 1620                                | (1340)                                      |
| 12/4  | 2953                                               | 1620                                | (1333)                                      |
| 12/5  | 2953                                               | 1620                                | (1334)                                      |
| 12/6  | 2955                                               | 1620                                | (1335)                                      |
| 12/7  | 2948                                               | 1620                                | (1328)                                      |
| 12/8  | 2939                                               | 1620                                | (1319)                                      |
| 12/9  | 2931                                               | 1620                                | (1311)                                      |
| 12/10 | 2930                                               | 1620                                | (1310)                                      |
| 12/11 | 2928                                               | 1620                                | (1308)                                      |
| 12/12 | 2931                                               | 1620                                | (1311)                                      |
| 12/13 | 2928                                               | 1620                                | (1308)                                      |
| 12/14 | 2929                                               | 1620                                | (1310)                                      |
| 12/15 | 2935                                               | 1620                                | (1315)                                      |
| 12/16 | 2929                                               | 1620                                | (1310)                                      |
| 12/17 | 2926                                               | 1620                                | (1306)                                      |
| 12/18 | 2921                                               | 1620                                | (1301)                                      |
| 12/19 | 2922                                               | 1620                                | (1303)                                      |
| 12/20 | 2926                                               | 1620                                | (1306)                                      |
| 12/21 | 2925                                               | 1620                                | (1306)                                      |
| 12/22 | 2926                                               | 1620                                | (1306)                                      |
| 12/23 | 2928                                               | 1620                                | (1308)                                      |
| 12/24 | 2923                                               | 1620                                | (1304)                                      |
| 12/25 | 2919                                               | 1620                                | (1300)                                      |
| 12/26 | 2917                                               | 1620                                | (1298)                                      |
| 12/27 | 2908                                               | 1620                                | (1288)                                      |
| 12/28 | 2906                                               | 1620                                | (1286)                                      |
| 12/29 | 2909                                               | 1620                                | (1290)                                      |
| 12/30 | 2903                                               | 1620                                | (1283)                                      |
| 12/31 | 2901                                               | 1620                                | (1282)                                      |

October 2018

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**City of Manassas Hypothetical Ammonia Load Exceedance**  
**Operations and Maintenance Calculations For FY-XX**  
**(Post Micron Expansion Scenario)**

Attachment A

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 1/1  | 2908                                               | 1620                                | (1288)                                      |
| 1/2  | 2908                                               | 1620                                | (1289)                                      |
| 1/3  | 2913                                               | 1620                                | (1293)                                      |
| 1/4  | 2901                                               | 1620                                | (1282)                                      |
| 1/5  | 2904                                               | 1620                                | (1284)                                      |
| 1/6  | 2898                                               | 1620                                | (1279)                                      |
| 1/7  | 2906                                               | 1620                                | (1286)                                      |
| 1/8  | 2905                                               | 1620                                | (1285)                                      |
| 1/9  | 2902                                               | 1620                                | (1282)                                      |
| 1/10 | 2898                                               | 1620                                | (1279)                                      |
| 1/11 | 2895                                               | 1620                                | (1275)                                      |
| 1/12 | 2892                                               | 1620                                | (1273)                                      |
| 1/13 | 2891                                               | 1620                                | (1271)                                      |
| 1/14 | 2886                                               | 1620                                | (1266)                                      |
| 1/15 | 2882                                               | 1620                                | (1262)                                      |
| 1/16 | 2881                                               | 1620                                | (1261)                                      |
| 1/17 | 2879                                               | 1620                                | (1259)                                      |
| 1/18 | 2875                                               | 1620                                | (1255)                                      |
| 1/19 | 2872                                               | 1620                                | (1252)                                      |
| 1/20 | 2869                                               | 1620                                | (1249)                                      |
| 1/21 | 2867                                               | 1620                                | (1247)                                      |
| 1/22 | 2868                                               | 1620                                | (1248)                                      |
| 1/23 | 2867                                               | 1620                                | (1247)                                      |
| 1/24 | 2870                                               | 1620                                | (1250)                                      |
| 1/25 | 2868                                               | 1620                                | (1249)                                      |
| 1/26 | 2870                                               | 1620                                | (1250)                                      |
| 1/27 | 2871                                               | 1620                                | (1251)                                      |
| 1/28 | 2874                                               | 1620                                | (1254)                                      |
| 1/29 | 2879                                               | 1620                                | (1260)                                      |
| 1/30 | 2881                                               | 1620                                | (1261)                                      |
| 1/31 | 2877                                               | 1620                                | (1257)                                      |

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 2/1  | 2874                                               | 1620                                | (1254)                                      |
| 2/2  | 2870                                               | 1620                                | (1250)                                      |
| 2/3  | 2879                                               | 1620                                | (1259)                                      |
| 2/4  | 2883                                               | 1620                                | (1263)                                      |
| 2/5  | 2891                                               | 1620                                | (1271)                                      |
| 2/6  | 2890                                               | 1620                                | (1270)                                      |
| 2/7  | 2890                                               | 1620                                | (1270)                                      |
| 2/8  | 2891                                               | 1620                                | (1271)                                      |
| 2/9  | 2897                                               | 1620                                | (1277)                                      |
| 2/10 | 2899                                               | 1620                                | (1279)                                      |
| 2/11 | 2921                                               | 1620                                | (1302)                                      |
| 2/12 | 2940                                               | 1620                                | (1320)                                      |
| 2/13 | 2950                                               | 1620                                | (1330)                                      |
| 2/14 | 2955                                               | 1620                                | (1335)                                      |
| 2/15 | 2954                                               | 1620                                | (1334)                                      |
| 2/16 | 2956                                               | 1620                                | (1336)                                      |
| 2/17 | 2954                                               | 1620                                | (1335)                                      |
| 2/18 | 2960                                               | 1620                                | (1340)                                      |
| 2/19 | 2954                                               | 1620                                | (1334)                                      |
| 2/20 | 2956                                               | 1620                                | (1337)                                      |
| 2/21 | 2955                                               | 1620                                | (1335)                                      |
| 2/22 | 2955                                               | 1620                                | (1336)                                      |
| 2/23 | 2956                                               | 1620                                | (1337)                                      |
| 2/24 | 2956                                               | 1620                                | (1337)                                      |
| 2/25 | 2964                                               | 1620                                | (1345)                                      |
| 2/26 | 2970                                               | 1620                                | (1350)                                      |
| 2/27 | 2972                                               | 1620                                | (1352)                                      |
| 2/28 | 2972                                               | 1620                                | (1352)                                      |
|      |                                                    |                                     |                                             |
|      |                                                    |                                     |                                             |
|      |                                                    |                                     |                                             |

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 3/1  | 2974                                               | 1620                                | (1354)                                      |
| 3/2  | 2973                                               | 1620                                | (1353)                                      |
| 3/3  | 2981                                               | 1620                                | (1361)                                      |
| 3/4  | 2981                                               | 1620                                | (1361)                                      |
| 3/5  | 2983                                               | 1620                                | (1364)                                      |
| 3/6  | 2978                                               | 1620                                | (1358)                                      |
| 3/7  | 2983                                               | 1620                                | (1364)                                      |
| 3/8  | 2984                                               | 1620                                | (1364)                                      |
| 3/9  | 2989                                               | 1620                                | (1369)                                      |
| 3/10 | 2992                                               | 1620                                | (1372)                                      |
| 3/11 | 2988                                               | 1620                                | (1369)                                      |
| 3/12 | 2995                                               | 1620                                | (1376)                                      |
| 3/13 | 2982                                               | 1620                                | (1362)                                      |
| 3/14 | 2968                                               | 1620                                | (1349)                                      |
| 3/15 | 2965                                               | 1620                                | (1345)                                      |
| 3/16 | 2962                                               | 1620                                | (1343)                                      |
| 3/17 | 2960                                               | 1620                                | (1340)                                      |
| 3/18 | 2962                                               | 1620                                | (1342)                                      |
| 3/19 | 2964                                               | 1620                                | (1345)                                      |
| 3/20 | 2966                                               | 1620                                | (1346)                                      |
| 3/21 | 2984                                               | 1620                                | (1364)                                      |
| 3/22 | 2993                                               | 1620                                | (1374)                                      |
| 3/23 | 3001                                               | 1620                                | (1381)                                      |
| 3/24 | 3008                                               | 1620                                | (1388)                                      |
| 3/25 | 3010                                               | 1620                                | (1390)                                      |
| 3/26 | 3020                                               | 1620                                | (1401)                                      |
| 3/27 | 3017                                               | 1620                                | (1397)                                      |
| 3/28 | 3016                                               | 1620                                | (1396)                                      |
| 3/29 | 3010                                               | 1620                                | (1390)                                      |
| 3/30 | 3000                                               | 1620                                | (1381)                                      |
| 3/31 | 2990                                               | 1620                                | (1370)                                      |

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**City of Manassas Hypothetical Ammonia Load Exceedance Calculations For FY-XX**  
**(Post Micron Expansion Scenario)**

Attachment A

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation<br>(lbs/day) | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|-------------------------------------|---------------------------------------------|
| 4/1  | 2976                                               | 1620                                | (1357)                                      |
| 4/2  | 2973                                               | 1620                                | (1353)                                      |
| 4/3  | 2968                                               | 1620                                | (1348)                                      |
| 4/4  | 2963                                               | 1620                                | (1344)                                      |
| 4/5  | 2949                                               | 1620                                | (1329)                                      |
| 4/6  | 2937                                               | 1620                                | (1317)                                      |
| 4/7  | 2930                                               | 1620                                | (1311)                                      |
| 4/8  | 2924                                               | 1620                                | (1304)                                      |
| 4/9  | 2903                                               | 1620                                | (1283)                                      |
| 4/10 | 2881                                               | 1620                                | (1262)                                      |
| 4/11 | 2865                                               | 1620                                | (1245)                                      |
| 4/12 | 2873                                               | 1620                                | (1254)                                      |
| 4/13 | 2869                                               | 1620                                | (1249)                                      |
| 4/14 | 2861                                               | 1620                                | (1242)                                      |
| 4/15 | 2867                                               | 1620                                | (1247)                                      |
| 4/16 | 2890                                               | 1620                                | (1270)                                      |
| 4/17 | 2890                                               | 1620                                | (1271)                                      |
| 4/18 | 2897                                               | 1620                                | (1277)                                      |
| 4/19 | 2892                                               | 1620                                | (1272)                                      |
| 4/20 | 2885                                               | 1620                                | (1265)                                      |
| 4/21 | 2874                                               | 1620                                | (1255)                                      |
| 4/22 | 2865                                               | 1620                                | (1245)                                      |
| 4/23 | 2860                                               | 1620                                | (1240)                                      |
| 4/24 | 2854                                               | 1620                                | (1235)                                      |
| 4/25 | 2859                                               | 1620                                | (1239)                                      |
| 4/26 | 2858                                               | 1620                                | (1238)                                      |
| 4/27 | 2868                                               | 1620                                | (1248)                                      |
| 4/28 | 2873                                               | 1620                                | (1253)                                      |
| 4/29 | 2880                                               | 1620                                | (1260)                                      |
| 4/30 | 2888                                               | 1620                                | (1269)                                      |
|      |                                                    |                                     |                                             |

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|------------------------|---------------------------------------------|
| 5/1  | 2898                                               | 1620                   | (1278)                                      |
| 5/2  | 2893                                               | 1620                   | (1273)                                      |
| 5/3  | 2897                                               | 1620                   | (1278)                                      |
| 5/4  | 2912                                               | 1620                   | (1292)                                      |
| 5/5  | 2925                                               | 1620                   | (1305)                                      |
| 5/6  | 2930                                               | 1620                   | (1311)                                      |
| 5/7  | 2937                                               | 1620                   | (1317)                                      |
| 5/8  | 2940                                               | 1620                   | (1320)                                      |
| 5/9  | 2960                                               | 1620                   | (1340)                                      |
| 5/10 | 2979                                               | 1620                   | (1359)                                      |
| 5/11 | 2991                                               | 1620                   | (1372)                                      |
| 5/12 | 2984                                               | 1620                   | (1365)                                      |
| 5/13 | 2984                                               | 1620                   | (1364)                                      |
| 5/14 | 2989                                               | 1620                   | (1369)                                      |
| 5/15 | 2980                                               | 1620                   | (1360)                                      |
| 5/16 | 2960                                               | 1620                   | (1340)                                      |
| 5/17 | 2962                                               | 1620                   | (1342)                                      |
| 5/18 | 2968                                               | 1620                   | (1349)                                      |
| 5/19 | 2984                                               | 1620                   | (1364)                                      |
| 5/20 | 2979                                               | 1620                   | (1360)                                      |
| 5/21 | 2974                                               | 1620                   | (1354)                                      |
| 5/22 | 2973                                               | 1620                   | (1353)                                      |
| 5/23 | 2973                                               | 1620                   | (1353)                                      |
| 5/24 | 2973                                               | 1620                   | (1354)                                      |
| 5/25 | 2965                                               | 1620                   | (1345)                                      |
| 5/26 | 2961                                               | 1620                   | (1342)                                      |
| 5/27 | 2951                                               | 1620                   | (1332)                                      |
| 5/28 | 2957                                               | 1620                   | (1338)                                      |
| 5/29 | 2955                                               | 1620                   | (1335)                                      |
| 5/30 | 2957                                               | 1620                   | (1337)                                      |
| 5/31 | 2969                                               | 1620                   | (1349)                                      |

| Date | 30 Day Avg<br>City+Micron<br>NH4 LOAD<br>(lbs/day) | City NH4<br>Allocation | City NH4<br>LOAD<br>Exceedance<br>(lbs/day) |
|------|----------------------------------------------------|------------------------|---------------------------------------------|
| 6/1  | 2982                                               | 1620                   | (1362)                                      |
| 6/2  | 2998                                               | 1620                   | (1378)                                      |
| 6/3  | 3023                                               | 1620                   | (1403)                                      |
| 6/4  | 3041                                               | 1620                   | (1421)                                      |
| 6/5  | 3049                                               | 1620                   | (1429)                                      |
| 6/6  | 3051                                               | 1620                   | (1431)                                      |
| 6/7  | 3057                                               | 1620                   | (1437)                                      |
| 6/8  | 3055                                               | 1620                   | (1436)                                      |
| 6/9  | 3054                                               | 1620                   | (1434)                                      |
| 6/10 | 3052                                               | 1620                   | (1432)                                      |
| 6/11 | 3050                                               | 1620                   | (1430)                                      |
| 6/12 | 3045                                               | 1620                   | (1425)                                      |
| 6/13 | 3038                                               | 1620                   | (1418)                                      |
| 6/14 | 3038                                               | 1620                   | (1418)                                      |
| 6/15 | 3046                                               | 1620                   | (1426)                                      |
| 6/16 | 3048                                               | 1620                   | (1429)                                      |
| 6/17 | 3037                                               | 1620                   | (1417)                                      |
| 6/18 | 3025                                               | 1620                   | (1405)                                      |
| 6/19 | 3026                                               | 1620                   | (1406)                                      |
| 6/20 | 3027                                               | 1620                   | (1407)                                      |
| 6/21 | 3033                                               | 1620                   | (1414)                                      |
| 6/22 | 3045                                               | 1620                   | (1425)                                      |
| 6/23 | 3062                                               | 1620                   | (1442)                                      |
| 6/24 | 3078                                               | 1620                   | (1458)                                      |
| 6/25 | 3092                                               | 1620                   | (1472)                                      |
| 6/26 | 3099                                               | 1620                   | (1480)                                      |
| 6/27 | 3097                                               | 1620                   | (1477)                                      |
| 6/28 | 3102                                               | 1620                   | (1482)                                      |
| 6/29 | 3103                                               | 1620                   | (1483)                                      |
| 6/30 | 3089                                               | 1620                   | (1470)                                      |
|      |                                                    |                        |                                             |

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## **APPENDIX E: Copper Allocation Agreement**

## Appendix E

### **City of Manassas/Micron Technology, Inc. and the Upper Occoquan Service Authority Copper Allocation Agreement**

This Agreement is entered into this 1st day of August, 2019 between the Upper Occoquan Service Authority ("UOSA"); the City of Manassas ("City"); and Micron Technology, Inc. ("Micron").

**WHEREAS**, UOSA and the City are signatories to a 2007 Revised and Restated Service Agreement as that Agreement has been amended from time to time ("the Service Agreement"); and

**WHEREAS**, Section 6.7 of the Service Agreement provides limits to each member Political Subdivision ("Political Subdivision" as defined in the Service Agreement) for discharge by weight or concentration of the total design capacity of the UOSA Plant; and

**WHEREAS**, Micron is expanding its facility in the City of Manassas and this expansion is anticipated to produce wastewater that will significantly exceed the City's allocation of copper; and

**WHEREAS**, under its Wastewater Pretreatment Program, UOSA has established a Maximum Allowable Industrial Loading (MAIL) for copper and has allocated the available copper loading to each Political Subdivision ; and

**WHEREAS**, under 54 MGD design conditions the overall UOSA MAIL for copper is 78.6 pounds per day (ppd) (54 MAIL). The City's share of the 54 MAIL is 12.7 ppd. At current flows the overall UOSA MAIL for copper is 40.5 ppd (Current MAIL). The City's share of the Current MAIL is 6.5 ppd; and

**WHEREAS**, Micron, an industrial customer located in the City, is currently the only industrial copper discharger in the UOSA Service Area and will be expanding its operations in the near future; and

**WHEREAS**, Micron is requesting that it be allowed to discharge an industrial copper load of up to a total of 12 ppd from the combination of its existing and expanded facility. This loading will not exceed the City's allocated share of UOSA's 54 MAIL. However, the Current MAIL for copper is more stringent than the 54 MAIL because there is less dilution from standard domestic and commercial wastewater, and it is anticipated that the City will exceed its allocated share of the Current MAIL following the Micron expansion; and

**WHEREAS**, the City, on behalf of Micron, has requested that they be allowed to exceed their share of the Current MAIL with the understanding that this discharge of copper in exceedance of the City's Current MAIL allocation does not give Micron or the City any continuing rights in the UOSA Plant or UOSA Delivery System or continuing rights to be able to discharge this amount in the future, if it will cause UOSA to exceed its overall Current MAIL; and

**WHEREAS**, while UOSA can accommodate Micron's 12 ppd copper discharge request at this time, the City and Micron recognize that industrial growth in UOSA's other Political Subdivisions may require UOSA to someday rescind its approval of the City's copper loading that is in exceedance of its Current MAIL allocation.

**NOW** therefore in consideration of the foregoing, the parties agree as follows:

1. UOSA agrees to accept the City's and Micron's 12 ppd copper discharge for treatment at the UOSA plant as set forth herein. Acceptance of such discharge shall not entitle either the City or Micron to permanent rights to this amount of discharge of copper.
2. UOSA, by allowing the City to exceed its allocated share of the Current MAIL, is authorizing the City to use portions of the shares of Current MAIL allocated to Prince William County, Fairfax County, and City of Manassas Park (collectively, the "Other Political Subdivisions") who are parties, along with the City, to the Service Agreement.
3. Should any of the Other Political Subdivisions have development in their respective jurisdictions that requires the use of their allocated share of the Current or its 54 MAIL, and such use by the Other Political Subdivisions would cause UOSA to exceed its Current or its 54 MAIL, the City and Micron further agree to adjust their copper discharge as necessary to ensure UOSA does not exceed its Current or its 54 MAIL for copper; provided, however, that nothing in this Agreement shall be interpreted as requiring the City to reduce its copper discharge below its allocated share of the Current or 54 MAIL.
4. UOSA shall provide written notice to the City and Micron if an adjustment is needed to ensure UOSA does not exceed its Current or its 54 MAIL. Upon UOSA's written notice to the City and Micron that another Political Subdivision may have need for its (or Other Political Subdivisions') allocated copper loadings, the City and Micron must comply with the notice to adjust its discharge of copper loadings within six months of the date of the written notice. In the event that more than one Political Subdivision has a need to exceed its allocated copper loadings, and UOSA can accommodate all such requests without exceeding UOSA's permit limits and additional costs, any unused loadings shall be allocated to those exceeding Political Subdivisions in accordance with their proportionate share (or reallocated share pursuant to Section 5.4 or Section 6.5) of the total design capacity of the UOSA Plant. However, no Political Subdivision may

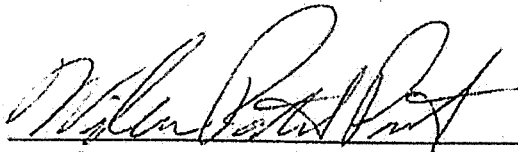
exceed its allocations without UOSA's written approval under Section 6.7 of the Service Agreement.

5. UOSA shall provide written notice to the City and Micron if UOSA's 54 MAIL for copper is reduced to a level below 78.6 pounds per day. The City and Micron agree that upon receipt of such notice, the City and Micron shall immediately take steps to adjust their copper discharge as necessary and conclude such adjustments within six months of the date of UOSA's written notice or such shorter timeframe as stated in the notice where necessary for UOSA to comply with any law, ordinance, regulation, order, judgment, or other legal requirement.

6. The parties acknowledge that the nature of the rights granted to the City and Micron under this agreement make the assessment of damages difficult should the City and Micron fail, after receipt of the required notice from UOSA, to timely adjust their copper discharge as required in Paragraph 4 and Paragraph 5 of this Agreement. Accordingly, notwithstanding anything to the contrary, in the event of a breach of Paragraph 4 or Paragraph 5 by the City and/or Micron, the parties agree that, in addition to such other contractual, legal, and equitable remedies, UOSA has the right to take steps necessary to prevent and/or address the breach including the seeking of a temporary restraining order, a preliminary or permanent injunction, and/or a decree for specific performance, in each case without being required to prove actual damages or furnish a bond or other security. Further, the parties agree that in the event of litigation the prevailing party will be entitled to recover all costs and expenses incurred, including reasonable attorney's fees.

7. Micron agrees to comply with an Industrial Wastewater Discharge Permit to be granted by UOSA. The requirements of this Copper Agreement will be incorporated into that permit. Failure to comply with any request by UOSA to adjust copper discharges in compliance with this Copper Agreement will cause Micron to be in violation of its Industrial Wastewater Discharge Permit.

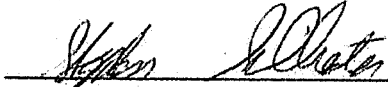
8. Nothing in this Agreement modifies the obligations of the City or UOSA under the Service Agreement. However, based upon this Agreement and pursuant to Section 6.7 of the Service Agreement, UOSA advises the City that it may deliver its sewage to UOSA with the increased copper loadings as set forth herein.



City of Manassas authorized representative

6-28-19

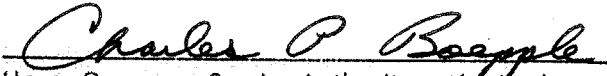
Date



Micron Technology, Inc. authorized representative

7/10/19

Date



Upper Occoquan Service Authority authorized representative

7/11/2019

Date

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